Colorado Environmental Performance Partnership Agreement

FY2017 End-of-Year Assessment

An Assessment of Environmental Accomplishment and Challenges for the Period of October 1, 2016 through September 30, 2017

Colorado Department of Public Health and Environment

U.S. Environmental Protection Agency Region 8





Table of Contents

| Table | of Contents | 1 |
|-------|---|----|
| 1.0 | Introduction to the End-of-Year Assessment | 2 |
| 2.0 | Division of Environmental Health and Sustainability FY2017 Status and Accomplishments | 3 |
| 3.0 | Air Pollution Control Division FY2017 Status and Accomplishments | 21 |
| 4.0 | Water Quality Control Division FY2017 Status and Accomplishments | 49 |
| 5.0 | Hazardous Materials and Waste Management Division FY2017 Status and Accomplishments | 71 |
| 6.0 | E-Enterprise/Exchange Network FY2017 Status and Accomplishments | 92 |

1.0 Introduction to the End-of-Year Assessment

The Colorado Environmental Performance Partnership Agreement (CEPPA) is an agreed-to plan between the Colorado Department of Public Health and Environment and Region 8 of the Environmental Protection Agency to address environmental issues and problems in Colorado. It reflects commitments made by both agencies to environmental management.

The CEPPA document:

- 1) Defines the roles of the Colorado Department of Public Health and Environment (CDPHE) and Region VIII EPA;
- 2) Identifies the overall priorities for environmental protection in Colorado; and,
- 3) Describes what the state and federal environmental program efforts will be to protect air, water and the land.

The FY2016-2017 CEPPA includes environmental program work plans funded, in part, from the Performance Partnership Grant (PPG) as a part of the comprehensive environmental program plan for Colorado. The purpose of this report is to describe the program accomplishments for the grant period from October 1, 2016 through September 30, 2017.

This report also is intended to fulfill the requirement of the PPG program grant awarded to the state by EPA for an end-of-year assessment. This was conducted during the period of November through December 2017 by the CDPHE Environmental Programs. Areas assessed include all program activities and accomplishments for all media. This report will be used, along with other guidance, as part of the ongoing PPA update process.

This report is intended to provide an overview of the progress of environmental management in addressing air, water and waste issues in Colorado.

This assessment was completed by CDPHE program staff and to some degree by EPA Region 8. This assessment is part of the continuing cycle of interagency planning and implementation to address the major environmental concerns in Colorado.

2.0 Division of Environmental Health and Sustainability FY2017 Status and Accomplishments

Sustainability Unit

Strategic Focus Area: Funding

Supplemental Environmental Projects

| Goals | Objectives | Timeline | FY2017 Status and Accomplishments |
|---|---|-------------------|--|
| Support and advise Cross-Media Enforcement Team (CMET) on SEP related issues. | Review SEP and Eligible Governmental Entity policies annually and make recommendations to CMET as needed. | Annually | Policies reviewed: 1 CMET meetings attended: 1 |
| Increase efficacy and efficiency of SEP | As requested by environmental divisions: coordinate directly with regulated entities to: present SEP policy and assist in finding appropriate SEP ideas; analyze and evaluate SEP proposals; track project progress and interim deadlines; and review SEP Completion Reports. | Ongoing | SEP proposals evaluated: 8 Finalized 7 SEP agreements totaling \$710,050 SEP Completion Reports reviewed: 9 |
| program. | Administer SEP idea database and Sharepoint site; develop and administer the department's SEP website; develop SEP Report to track environmental outcomes from SEPs. | Ongoing | 16 new SEP ideas included in database Annual SEP Report posted on website - In progress Environmental and public health outcomes from SEPs are tracked using an internal Sharepoint site and available at any time upon request. |
| Increase community awareness of and | When appropriate, partner with regulated entities to implement a community SEP process. | Ongoing | The community SEP Process was not used in the last year. |
| access to the SEP program. | Create best management practices for implementing community SEP process. | September 2016 | Guidelines developed and approved |

| Present to local public health agencies, non-profits, and community groups on SEPs. | Ongoing | # of entities reached: 22 |
|---|---------|---------------------------|
|---|---------|---------------------------|

Strategic Focus Area: Funding

Medication Take-Back Program

Supports EPA 2014-2018 Strategic Goals - Goal 2: Protecting America's Waters; Goal 4: Ensuring the Safety of Chemicals and Preventing Pollution.

| Goal | Objectives | Timeline | FY2017 Status and Accomplishments |
|--|--|----------|--|
| Reduce pharmaceuticals in the environment (PIE). | Execute new services contract for the Colorado Medication Take-Back Program to include collection of prescribed controlled substances. Continue program operation and expand its reach to include at least one law enforcement collection location in every Colorado county. | Ongoing | Signed services contract: Contract with Assured Waste Solutions renewed for second year effective 07/01/17. Pounds of medications collected: Medication collections began 11/01/16. 8,173 pounds collected by 06/30/17. # of locations added: 65 collection locations enrolled by 06/30/17. # of citizen inquiries: Responded to 201 citizen inquiries regarding household medication disposal. |
| | Engage stakeholders and develop Take-Back Program rules for consideration and adoption by the Solid and Hazardous Waste Commission. | May 2016 | Rules adoption by Commission: Rules were adopted 5/17/16. # of stakeholder meetings: None |
| | Assist with the problem identification and outreach efforts surrounding PIE. | Ongoing | # of stakeholders contacted: None |

| | | | # of projects initiated: Other than expanding the medication take-back program, no PIE projects initiated. |
|--|--|--|--|
|--|--|--|--|

Strategic Focus Area: Funding

State Grant & Rebate Programs for Waste Diversion and Pollution Prevention

Supports EPA 2014-2018 Strategic Goals - Goal 1: Addressing Climate change and Improving Air Quality; Goal 3: Cleaning up Communities and Advancing Sustainable Development; Goal 4: Ensuring the Safety of Chemicals and Preventing Pollution.

| Goals | Objectives | Timeline | FY2017 Status and Accomplishments |
|--|--|----------|---|
| | Assist and support PPAB in grant review and selection process. | Annually | 3 of new projects awarded for a total of \$60,000. |
| Administer the P2 Grants Program from the state P2 Fund. | Provide technical assistance to grantees. Track project progress and outcomes. | Annually | Environmental benefits of completed P2 grants: 14,000 kilo-gallons annually of potable water for outdoor irrigation reduced at two Denver schools 1,098 low-income residents provided with energy and water efficiency upgrades and education 2,249,601 total gallons of water conserved by improvements \$576,330 in cumulative annual savings for participants 4 sustainability conferences or workshops sponsored |
| Assist and support PPAB and the | Assist in the development of criteria for grants. Announce grant solicitation and assist in the application evaluations. | Annually | Criteria developed 22 grants awarded in FY 17 |
| Assistance Committee in implementation of the Colorado Recycling Resources Economic Opportunity Grant Program. | Support grant recipients and track project performance, make project results available to the public. | Ongoing | Projects completed in a timely manner Results available to public 19,760 Tons of material diverted from landfill and 31 jobs created in FY 17. |

| PRELI Panata Program | Assist in the development of criteria for rebates and announce rebate solicitation. | Annually | Criteria Developed Rebates supported 118 free public drop-off sites. \$381,000 total rebate funding awarded in FY17. |
|----------------------|---|----------|--|
|----------------------|---|----------|--|

Strategic Focus Area: Outreach and Technical Assistance

Pollution Prevention Program

| Goals | Objectives | Timeline | FY2017 Status and Accomplishments |
|--|---|-----------------------------------|---|
| Create cooperative partnerships among businesses, the environmental | Provide on-site P2 Technical Assistance | Ongoing | 12 facilities visited 1 food manufacturer visited 1 facility implementing at least one recommendation |
| community and the department through which technical assistance, outreach and education activities are coordinated and conducted. | Provide Outreach, training and workshops on P2 and sustainability concepts | Ongoing | 11 training events ~700 participants |
| | Develop outreach materials and a Colorado- specific case study on an innovative P2 technique. | Ongoing | 3 outreach materials developed Over 3,700 people reached |
| Integrating P2 concepts into department regulatory programs. | Coordinate with department inspectors to distribute P2 sector-based information and make P2 referrals | Ongoing | 16 inspectors engaged and distributing P2 materials 350 outreach materials distributed 17 P2 referrals made |
| Increase employee engagement in sustainability activities. | Hold CDPHE-wide Cherry Creek Cleanups along the creek designated for CDPHE. | Fall & Spring 2016 and 2017 | 80 participants including employees and partners |

Sustainability Unit
Strategic Focus Area: Outreach and Technical Assistance

SARA Programs

Supports EPA 2014-2018 Strategic Goal - Goal 4: Ensuring the Safety of Chemicals and Preventing Pollution.

| Goals | Objectives | Timeline | FY2017 Status and Accomplishments |
|--|--|--|--|
| | Receive and enter TRI (using the Exchange Network) and Tier II data from Colorado businesses (currently 16,201 facilities; 5,199 chemicals). | Annually TRI - July Tier II - March | Timely and effective data entry 965 electronic Tier II reports received and distributed to Colorado LEPCs and Fire Districts via single-point submission process. -0- paper Tier II reports received |
| Effectively and efficiently implement the EPCRA/SARA Title III TRI and Tier II | Develop and maintain the Tier II database. | Ongoing | Tier II reporting database is searchable, maintained, and updated monthly. |
| programs including all associated databases. | Assess SARA (P2) fees, generate and mail bills, monitor payments and follow-up with unpaid accounts. | Annually | Fees assessed and bills sent annually in July (Tier II) and October (TRI). \$140,445 - total amount of fees assessed for FY18. 1,088 bills sent |
| | Review state required fields for electronic reporting of Tier II reports using EPA Tier2Submit software. Updated as needed. | Annually | No state fields updated. |
| | Development and testing of Colorado Environmental Online Services (CEOS) for Tier II reporting (will launch for reporting use in 2018). EPA compliant software. | Ongoing | Registration for Colorado Tier II submit reporters will begin December 2017. |
| Provide information on program | Respond to inquiries regarding Tier II and TRI reporting and payment requirements from Colorado businesses. | Ongoing | Response provided in a timely manner to all technical, regulatory, and billing inquires. |
| internally, and to public and facilities. | Respond to inquiries on information to the public and appropriate parties. | Ongoing | No data requests No public inquiries |

| | Generate chemical inventory reports for electronic transmittal to appropriate parties (LEPCs, CEPC, EPA, HMWMD Records Center, EMP). | Ongoing | 965 electronic Tier2Submit reports provided to appropriate parties (CEPC, LECPs, Fire Districts) |
|--|--|---------|--|
|--|--|---------|--|

Strategic Focus Area: Outreach and Technical Assistance

Small Business Ombudsman

| Goals | Objectives | Timeline | FY2017 Status and Accomplishments |
|---|--|-----------|--|
| | | | Served on NSC Technical Subcommittee as Alternate Rep for Region 8. NSC prepared comments on TSC Reg Reform. |
| | | | Participated on Promotional/Awards Subcommittee. |
| Represent Colorado | National: Serve on the 507 Programs National Steering Committee (NSC) or various subcommittees (includes attending monthly conference calls and annual meeting, and providing relevant materials related to CO's program). Solicit comments on new/modified regulations from the small business community through CO's Compliance Advisory Panel (CAP) and provide, as appropriate to the NSC for submittal to EPA. Regional: Maintain connection to WY, Montana and Utah's 507 Programs | Ongoing | Served as co-chair of 2017 Annual SBAP/SBO Training Planning Committee. Training attended by 37 states and territories Positive reviews received from the 55 attendees. |
| at the national and regional level as CDPHE's Small Business Ombudsman (SBO). | | | Participated in a number of conference calls and webinars including: NAACA; ECOS; SBA Advocacy calls; TSCA vapor degreasing rule; TCE spot cleaning rule impact on dry cleaner industry; Cost analysis and risk assessment, financial responsibility for hardrock mining industry; and SBA access to capital - funding options for Women-owned businesses. |
| | | | Mar 2017 Submitted 2 articles for the EPA SBO small business newsletter on behalf of Region 8. |
| | | | Contributed CO SBO information to SBAP/SBO/CAP's Annual report submitted to NSC for SBEAPs. |
| Provide and track assistance provided | Refer small businesses to technical resources in SBAP and other Sustainability Unit programs as appropriate. | Ongoing | All calls with technical nature are transferred to SBAP. |
| to Colorado's small businesses. | Send small businesses customer assistance evaluation surveys to gauge value of SBAP services. | Origonity | 160-170 evaluation surveys sent to SBs with ~35% return rate |

| | Serve as an impartial resource for small businesses that have complaints or concerns about fair treatment by the environmental divisions. | Ongoing | Arranged environmental permitting meeting for Solid Power, Inc. with CDPHE environmental divisions. Presented on Env. Programs to group from Azerbaijan. |
|---|---|----------|---|
| Serve as a resource | Review SBAP guidance documents and provide comments to SBAP prior to issuance. | Ongoing | Reviewed documents upon request, including: new APEN applications; AQ & HW compliance calendar for perc dry cleaners; and Sustainable Breweries Opportunity Reports. |
| for small businesses. | | | Send monthly survey evaluations to small businesses assisted by SBAP. Prepare quarterly reports for program |
| | Provide training and outreach on tools available for small businesses and the assistance available through SBAP. | Ongoing | ~100 Small Businesses reached, primarily through Ag contacts. |
| | Review SBO web page for improvements | Oct 2016 | Revisions implemented. |
| Support and coordinate the Compliance Advisory Panel. | Assist in ensuring the Compliance Advisory Panel is an effective resource for small businesses and CDPHE. | Ongoing | 3 CAP meetings held 8 presentations to the CAP, including guidance documents, projects and issues for its advisory opinions Provided orientation/training for 4 new members |

Strategic Focus Area: Outreach and Technical Assistance

Greening State Government Initiative

| Goals | Objectives | Timeline | FY2017 Status and Accomplishments |
|---|---|--|--|
| | Participate as a lead state agency in implementing Greening Government programs and activities. | Greening Government Ongoing Prepared annual repo | |
| Administer Greening Government Program to reduce environmental impacts from state operations. | Attend and participate in regular meetings with other state agencies participating on the Greening Government Leadership Council. | Ongoing | CDPHE hosts the Greening Government Leadership Council monthly meeting. Participation at meetings: 12 meetings attended |
| | Establish an internal greening government team to increase employee engagement. | Ongoing | Green Team current members: 119 |

| | Identify targets and objectives for annual Greening Government Projects. | Ongoing | Energy, Water and Fleet Management Plans were updated for FY17, looking forward into FY18. |
|--|--|---------|---|
| | Implement projects to meet targets and objectives. | Ongoing | Results of CDPHE GG projects may be found in Colorado's GG Annual Report Card. |
| | Provide assistance to other state agencies. | Ongoing | # of agencies provided assistance: 20 |
| | Report out on projects and efforts. | Ongoing | Developed GG intranet website. Results communicated to Executive Director's Office and Senior Management Team. |
| Encourage, award, and educate the use of sustainability practices throughout Colorado. | Provide education and training to business, state and local government, and employees on sustainability practices. | Ongoing | CDPHE Green Team has sponsored 10 Lunch & Learn educational opportunities for CDPHE staff. |

Strategic Focus Area: Environmental Recognition

Environmental Leadership Program

| Goals | Objectives | Timeline | FY2017 Status and Accomplishments |
|---|---|--------------------------|---|
| | Plan and hold an annual awards and recognition event for new and renewing ELP members. | Annually each October | 400 attendees |
| Encourage organizations to go beyond compliance to achieve significant environmental benefits by providing meaningful incentives and recognition. | Expand membership in the Bronze, Silver and Gold levels of ELP in order to further P2 activities and increase environmental benefits. | Ongoing | 20 new gold leaders 5 EMS assessed 20 renewing gold leaders 13 new silver partners 20 new bronze achievers 4 new food manufacturers |

| | Promote the ELP by providing ELP presentations to internal divisions, businesses, and other organizations. | Ongoing | 3 internal presentations 2 external presentations Total number of participants 7 ELP referrals from state and local employees 7 new members as a result of internal referral |
|---|---|----------------------------|--|
| | Promote the adoption of EMSs to environmental programs and state agencies by holding EMS training events. | Ongoing | 1 EMS training events 50 new companies applying to the ELP as a result |
| Provide EMS technical assistance and P2 education and training to ELP members | Provide technical assistance and gap analysis for potential ELP members. | Ongoing | 5 facilities provided assistance |
| and potential members. | In partnership with Colorado Environmental Partnership, provide P2 and sustainability education and training to businesses, government, and department employees. | Ongoing | 1 educational event held 60 participants |
| | Provide mentoring opportunities. | Ongoing | 10 mentoring opportunities |
| Provide additional member services, mentoring and reporting. | Develop general guidance for ELP members on how to measure, track and reports metrics | Ongoing | 166 companies receiving guidance Improved data quality and understanding of calculating metrics |
| | Survey ELP members to obtain environmental results from implementation of improvement projects. | Annually by October 1 | 169 survey responses collected |
| | Develop an annual ELP progress report. | Annually by December 31 | Completed December 2016. |

Strategic Focus Area: Collaboration

Environmental Justice

| Goals | Objectives | Timeline | FY2017 Status and Accomplishments |
|---|---|---|--|
| | Raise awareness within the DEHS and other CDPHE programs on Health Equity (HE) and EJ issues that affect daily work duties and responsibilities. | Ongoing | 6 documents/policies reviewed |
| Compared the algorithm and to | Participate in meetings between DEHS, and other CDPHE staff and communities, as appropriate. This may also include participating in community events. | Ongoing | Participated in 2 meetings. |
| Serve as the department's liaison to EPA on | | | No EPA specific trainings offered on HE/EJ topics |
| environmental justice issues. | Work with EPA to provide training to CDPHE staff on emerging EJ issues, as appropriate. | Ongoing | EPA staff were invited to speak/attend two SC mtgs ~20 attendees at CDPHE-HE/EJ trainings or educational opportunities |
| | Meet regularly with EPA to discuss EJ issues of mutual concern. Assist in bringing EJ training opportunities to CDPHE. | Ongoing | Participated in 2 meetings with EPA attending. |
| | | | At least 4 meetings attended. |
| Participate in the CDPHE Health Equity/Environmental | Actively participate in identifying and implementing CDPHE's path forward regarding HE and EJ issues. | Ongoing | Guidance, tools and training shared with staff and EPA, and added to HE & EJ intranet site. |
| Justice (HE & EJ) Collaborative. | (HE & EJ) Review E I-related documents/policies, collaborate | Guidance documents for Incorporating Environmental Justice into Environmental Regulatory Programs were reviewed and approved. | |

Strategic Focus Area: Collaboration

Self-Audit Law

Supports EPA 2014-2018 Strategic Goals - Goal 5: Protect Human Health and the Env. by Enforcing Laws and Assuring Compliance.

| Goals | Objectives | Timeline | FY2017 Status and Accomplishments |
|--|---|----------|---|
| Maintain the Self-Audit Policy and partner with EPA. | Abide by the Memorandum of Agreement and the EPA Self-Audit Policy. | Ongoing | 16 entities submitting Self-Audit Requests |
| Maintain internal contacts with each CDPHE division. | Coordinate Self-Audit submittals to appropriate divisions | Ongoing | 17 Closed Self-Audit requests 30 Open Self-Audit requests |
| Continue to expand, enhance and update the Self-Audit website. | Provide access to information as appropriate | Ongoing | Self-Audit Law website is maintained. |

Sustainability Unit

Strategic Focus Area: Collaboration

Cross Media and Emerging Environmental Initiatives

| Goals | Objectives | Timeline | FY2017 Status and Accomplishments |
|--|--|----------|--|
| Assist in the coordination of CDPHE innovations and cross-media approaches and strategies. | Coordinate regular Cross-Media Innovation and Strategy Team (CMIST) meetings to discuss cross-media opportunities and projects. Discuss emerging contaminants and other emerging environmental issues. | Ongoing | # of meetings held: CMIST is undergoing reorganization to revitalize its efforts. # of projects identified: No new projects identified. |
| Streamline and integrate enforcement policies and guidance in a consistent manner across the department. | Participate in the Cross-Media Enforcement Team. | Ongoing | 1 Meeting held to discuss revisions to the SEP Policy. |
| Reduce mercury in the environment. | Explore opportunities for mercury reduction and recycling programs. | Ongoing | No projects initiated in FY2017. |

Strategic Focus Area: Collaboration

Agriculture Pollution Prevention Initiative

| Goals | Objectives | Timeline | FY2017 Status and Accomplishments |
|---|--|----------|--|
| | Coordinate meetings of the subcommittee and interested stakeholders. | Ongoing | 3 meetings held in 2017 |
| | Develop incentives to promote implementation of ammonia reduction best management practices. | Ongoing | 1 incentive implemented: participated in applications review for Corn Legacy Program. |
| | Develop outreach materials to educate agricultural producers on agriculture's contribution to nitrogen deposition in RMNP. Plan for at least two Ag Outreach seminars | Ongoing | Two research articles distributed to RMNP Ag Subcommittee, presentations provided on BMPs, and updates by researchers presented. Ag Outreach seminars not conducted |
| Coordinate the Rocky Mountain National Park (RMNP) Agricultural | Coordinate with CSU and other partners to assure continuous ammonia monitoring and science-based information is reported back to the committee. | Ongoing | 4 summaries provided |
| Subcommittee. | Seek resources (grants) to support BMP research, outreach, monitoring, etc. Ongoin | Ongoing | Requested letters of support for USGS funding of NADP, provide states support for continuous monitoring efforts conducted at CSU, provided support for collecting funds from ag assns. No new grants applied for or awarded |
| | | | Continuous ammonia monitoring at Greeley in source area and Loveland fully funded as a result. |
| | Participate in contingency plan measures updates, if applicable. | Ongoing | Assisting in developing metrics for use of BMPs, no contingency measures developed. |
| Serve as lead on NRCS Air Quality Committee | Work to implement recommendations from the crop and livestock sectors into NRCS conservation programs, including air and water quality conservation practices. | Ongoing | Participated in 2 NRCS State Technical Committee meetings, shared air/water resource concerns for agency Support of air/BMPs for NRCS document developed by NRCS and EPA at RMNP Ag Subcommittee. |

| | | | One recommendation supported or implemented by NRCS within existing programs |
|--|--|---------|--|
| | Work with USDA Natural Resources Conservation Service to promote ammonia reduction BMPs. | Ongoing | BMPs promoted to Ag producers through RMNP Ag Subcommittee meetings |
| Increase compliance | Provide outreach and interpretation to livestock producers on applicable solid waste and industrial waste water requirements. | Ongoing | Ag producers are encouraged to participate in CEO and NRSC programs at RMNP Ag Meetings. |
| assistance and pollution prevention information to agriculture sector. | Coordinate communication within environmental divisions on issues impacting agriculture. Assist with permitting issues and questions from the ag industry on cross-cutting technologies. | Ongoing | None requested. |

Environmental Agriculture Program Animal Feeding Operation (CAFO, HCSFOS, AFO) Programs

Supports EPA 2014-2018 Strategic Goals Goal 2: Protecting America's Waters; Goal 5: Protecting Human Health and the Environment by Enforcing Laws and Assuring Compliance

| Subgoals | Objectives | Timeline | FY2017 Status and Accomplishments |
|---|---|---|--|
| CAFO REGULATIONS Implement state- water quality regulatory programs specific to animal feeding operations (AFOs), concentrated animal feeding operations (CAFOs) and housed commercial swine feeding operations (HCSFOs) as appropriate. | Improve sector compliance through the development of effective water quality protection regulations that are in compliance with federal and state statutes and rules. | As necessary, update and implement state CAFO regulations to address CAFOs that are impacting water quality, or to reflect changes made to the federal CAFO rule. | Revise applicable state CAFO regulations within one year of the effective date of applicable federal rules. 100% consensus with all stakeholders on proposed regulatory revisions prior to the final state rulemaking hearing before the Colorado Water Quality Control Commission. |
| CAFO PERMITS | Certify permitted CAFOs under Colorado CAFO general permit no. COA 932000. | On-going | # of permitted CAFOs recertified under COA 932000. N/A - New CAFO |

| Permit <u>CAFOs</u> in accordance with applicable federal and state regulatory requirements and deadlines. | Permit any new discharging CAFOs in accordance with applicable federal and state regulations. Enter all data requirements on permitted | Within 180 days of receipt of complete application. Mid Yr by April 30 EOY by | General permit COA933000 effective January 11, 2017. # of new CAFOs certified under |
|--|---|--|---|
| Reporting of permitted CAFO data to EPA. | CAFOs into ICIS, including the required elements of the approved Nutrient Management Plan. | Oct. 31 | permit COA 932000. N/A - New CAFO General permit COA933000 effective January 11, 2017. 65 CAFOs certified under new general permit to date. |
| | Participate as appropriate in quarterly meetings with EPA to discuss progress towards meeting annual permitting and enforcement commitments. | Quarterly, as scheduled | % of permitted CAFOs entered into ICIS. 100% |
| CAFO INSPECTIONS | Inspect all permitted CAFOs at least once | Ongoing over rolling five | % of known CAFO universe inspected |
| Conduct inspections to determine | during the life of the permit, every unpermitted CAFO at least once every five | year periods. | every five years (at a minimum). 100% |
| compliance with applicable federal and state regulatory and/or permit requirements. | years, and all medium AFOs at least once to determine if it is a medium CAFO. | | # of CAFOs inspected. 51 (including HCSFOs) |
| | Complete a minimum of 40 compliance inspections by the end of each inspection | Annually by Sept. 30 | # of medium AFOs inspected. 1 |
| | year (i.e., Sept. 30 th) in accordance with Colorado's Inspection Plan. | Aimaily by Sept. 30 | % of return to compliance actions completed within established compliance deadline included in the |
| | Participate in up to four joint/oversight EPA/State CAFO inspections, in addition to | | follow up inspection report. 87% |
| | any other oversight inspections that may be conducted. (EPA will contact the Ag Program to schedule joint/oversight inspections at facilities identified in the CAFO inspection plan. | | # and type of [joint/oversight] inspections completed. 0 |
| Report CAFO inspection information to EPA. | • Enter all permitted CAFO inspections into ICIS. | Mid Yr by April 30 EOY by Oct. 31 | % of permitted CAFO inspections entered into ICIS by established |
| | Submit to EPA draft CAFO inspection plan that includes CDPHE inspection commitments for the coming federal fiscal year. | Annually by Sept. 1 | timeline. 100% |

| Submit CAFO Inspection Plan to EPA. | Finalize CAFO inspection plan within 15 days of receiving EPA comments. | Annually by Sept. 30 | Submission of final CAFO inspection plans by established timelines. Draft plan sent to EPA on 8/10/2016. No comments received; final plan sent on 9/16/2016. |
|--|--|--------------------------------------|---|
| CAFO ENFORCEMENT Maintain a high overall compliance rate with applicable state and federal water quality CAFO requirements. | Evaluate all violations to determine appropriate response consistent with priorities established in CDPHE's Clean Water Action Plan, the CAFO compliance and enforcement strategy and the Animal Feeding Operations Enforcement Response Guide (AFO ERG). | Annually by Sept. 30 | # informal enforcement actions issued. 16 # formal enforcement actions issued. 0 |
| | Take timely and appropriate action when necessary against facilities to protect communities and the environment, including formal enforcement actions for any large or medium CAFO determined to have discharged to waters of the U.S. | | Avg. no. of days to return to compliance after initial notice of violation and submittal deadline is provided to the facility. N/A - no NOVs issued during the reporting period. |
| | Continue to update the AFO ERG and the compliance and enforcement strategy as necessary. Enter enforcement actions into ICIS for permitted CAFOs. | Mid Yr by April 30 EOY by Oct. 31 | |
| CAFO END-OF-YEAR REPORTING & ACTIVITIES Submit PPA EOY reporting information to EPA. | Report to EPA on the number of CAFOs permitted under Colorado general and individual CAFO permits. Report to EPA on the number of inspections completed, inspection status and the status of inspection follow up activities. | Annually by Dec. 31 | % of permitted CAFO renewals entered into ICIS within 60 days of effective date of the permit. 100% % of enforcement data entered into ICIS by established deadline. 100% EOY report and CAFO inventory submitted to EPA by the established |

| Submit an electronic copy of the CAFO inventory to EPA and report on progress made toward inventory development. | timeline. EOY report and CAFO inventory submitted to EPA R8 by established deadline. |
|---|--|
| Report to EPA on compliance assistance activities, training and presentations provided to the livestock industry. | |

Environmental Health

Strategic Focus Area: Collaboration

Regulatory Uniformity

Supports EPA 2014-2018 Strategic Goals Goal 2: Protecting America's Waters; Goal 4: Ensuring the Safety of Chemicals and Preventing Pollution; Goal 5: Protecting Human Health and the Environment by Enforcing Laws and Assuring Compliance

| Subgoals | Objectives | Timeline | FY2017 Status and Accomplishments |
|---|---|----------|--|
| Provide inspectional oversight to schools in rural areas. | Regulatory inspections performed in counties without local public health agencies under the jurisdiction of the department. | Ongoing | Percentage of schools with chemical laboratories inspected at least once during the performance period. 100% of schools with chemical laboratories were assessed at least once during FY2017 through field inspections. |

| Provide training and assistance to state and local public health personnel to assure uniformity in the application of the new school regulation. | | FY 2016 | Complete 6 joint regulatory school inspections and provide technical assistance as necessary to assure competency by local public health agency in program administration by end of performance period. |
|--|--|---------|---|
| | Train school inspection program staff of local organized county health department through joint regulatory school inspections and by providing technical assistance. | | A total of 34 joint regulatory school inspections were completed with school inspection program staff of local organized county public health departments during FY2017. Technical assistance was provided to school inspection program staff of local organized county health departments on a routine basis throughout FY2017. |
| Provide training and assistance to state schools to assure uniformity in the application of the new school regulation. | Coordinate the development and implementation of a classroom training course for school teachers and school personnel in county without local public | FY 2016 | Successful implementation of 1 school regulation training session for school teachers and school personnel in county without local public health agencies under the jurisdiction of the department. |
| | health agencies under the jurisdiction of the department. | | Status previously reported in FY2016 end-of-year assessment. |
| | Assist with the coordination and development of regulation training sessions for school teachers and school personnel in local public health agency jurisdiction. | | Successful implementation of 5 school regulation training sessions for school teachers and school personnel in local public health agency jurisdiction. |
| | | | Status previously reported in FY2016 end-of-year assessment. |

| Increase uniformity of school regulation implementation and school inspection program administration. | Develop program standards to assure regulatory uniformity for school inspection programs administered by local public health agencies statewide. | FY 2016 | Development of framework for school program standards for school inspection programs within local public health agencies. Status previously reported in FY2016 end-of-year assessment. |
|---|--|---------|---|
|---|--|---------|---|

3.0 Air Pollution Control Division FY2017 Status and Accomplishments

APCD Goal 1: Achieve a level of air quality that protects and preserves human health

Sub-goals include:

- Attain and maintain National Ambient Air Quality Standards
- Protect citizens from exposures to toxic air pollutants

EPA 2014-2018 Strategic Plan:

- Goal 1: Addressing Climate Change and Improving Air Quality
- Goal 4: Ensuring the Safety of Chemicals and Preventing Pollution (Reduce Children's Blood Lead Levels)
- Goal 5: Protecting Human Health and the Environment by Enforcing Laws and Assuring Compliance

| Program Strategy | Activity | Milestone/Measure | FY 2017 End-of-Year Status | | | |
|--|---|---|---|--|--|--|
| MOBILE SOURCE PROGRAMS | MOBILE SOURCE PROGRAMS | | | | | |
| 1.1 Operate Automobile Inspection and Readjustment (A.I.R.) Program and Clean Screen Program - Regulation No. 11 | Operate A.I.R. program in Denver metro and North Front Range areas. | Ongoing | A.I.R. Program inspected 882,000 vehicles during the fiscal year. In addition to the vehicles inspected at vehicle emissions inspection centers, 224,000 vehicles were identified as being clean screen eligible using remote sensing. Of these vehicles, 184,000 vehicles completed the clean screen process. More information on the A.I.R. Program may be obtained through the annual IM report. | | | |
| | Integrate North Front Range IM Program into state ozone SIP | Work with Policy and Planning, RAQC, and AQCC | AQCC incorporated the North Front Range area into Colorado's ozone SIP during a hearing on November 17, 2016. Preparation of hearing materials and proposal was conducted during FY'16. | | | |

| Ensure that the A.I.R. program in Denver metro and North Front Range areas is consistent with and continues to meet all SIP requirements. | Ongoing | Program met all SIP requirements. |
|---|---|--|
| Inspector training/certification maintained. | Ongoing | Mobile Sources Program continues to emphasize inspector training. Inspector certifications and training continues to be evaluated and updated. |
| Data collection and processing systems maintained. | Ongoing | On an ongoing basis, data collection and processing system have been maintained. |
| | | Data for the IM Program can be seen in the appendices of the annual IM report. |
| Support field enforcement activities by Dept. of Revenue. | Ongoing | Mobile Sources has supported Department of Revenue enforcement activities this past fiscal year. |
| | | More detail may be obtained through the annual Inspection/Maintenance Program report, specifically in the Department of Revenue section. |
| Monitor program quality and performance. | Ongoing. Annual report developed each year. | Annual A.I.R. Program report released to public in July 2017. The completed report may be accessed at the APCD web site, see https://www.colorado.gov/pacific/sites/default/files/AP_MVE_Colorado_2016_IM_Annual_Report_FINAL.pdf |
| Provide support to customers, inspectors, auto entities and repair technicians. | Ongoing | Mobile Sources Program conducted various outreach programs such as "Tech nights" for the repair industry. In association with CDPHE, the state's contractor maintains outreach programs that include |

| | | | public service radio ads. Further information is located on their and CDPHE's websites. Staff responded to customer, repair technician, and automotive industry inquiries on an ongoing basis. |
|---|---|---|--|
| 1.2 Operate Diesel Inspection and Self-certification Program - Regulation No. 12 (State only) | Similar operation and training measures as A.I.R. Program. | Ongoing | Operation of the Diesel Opacity Inspection and Fleet Self- Certification programs is ongoing. Staff has developed and implemented a new electronic inspector certification process. Inspector tests are in electronic form and are scored automatically. Tests results are then transmitted electronically to the Department of Revenue. |
| | Work with our counterparts at the regional and local levels to support the Colorado Clean Diesel Program. Continue to implement best practices as part of the Colorado Diesel Self-Certification Program. | Ongoing | Continuing to work with regional and local partners in support of the Colorado Clean Diesel Program. Emphasis has been placed on best practices for large Self-Certification fleets. Implementation of new data handling process allowing diesel motorists the ability to utilize an online renewal process, has been implemented. |
| | Support legislative and/or regulatory changes that permit the use of OBD or other innovative IM diesel tests that may be used to supplement or replace the current diesel test methods. | Track and respond to diesel bills in the legislature. Modify Regulation No. 12 as needed. | Continued to follow technologies that may be used to supplement or replace the current diesel test methods. Supported bill to allow enforcement measures against tampered diesel vehicles that emit excessive smoke emissions. This session's bill (SB17-278) passed the legislature. |
| 1.3 | Contribute to and engage in new ozone SIP developments. | Ongoing | Participated in the development of modifications to the ozone SIP. |

| Develop and participate in mobile source air quality improvement strategies | Participate in RAQC's Mobile Source/Fuels subcommittee. Assist and contribute to the formation and development of mobile source SIP strategies. Provide technical support and analysis on potential mobile source strategies, conduct vehicle emissions modeling in behalf of SIP activities, and provide guidance on various potential fuel strategies. | Ongoing | Contributed to the RAQC's Mobile Source/Fuels subcommittee. |
|---|--|---------|--|
| | Track, research, and advise senior management on legislative activities in support of new SIP development. | Ongoing | Provided senior management with updates throughout the SIP development process. |
| | Develop modifications to AQCC Regulations as needed. Present proposed modified regulations to the AQCC for their consideration. | Ongoing | At the November 2016 AQCC meeting, modified AQCC Regulation number 11 to incorporate the North Front Range area into the existing ozone SIP. |
| | | | Modified AQCC Regulation Number 11 at a public hearing held on August 17, 2017 to update and correct provisions contained in Regulation Number 11. Modifications included clarifications regarding OBD inspection, as well as deletion of old and obsolete language. |
| | Implement any necessary SIP strategies. | Ongoing | Maintained the North Front Range inspection program, to permit its transition from a state-only program to its inclusion into the Ozone SIP. |
| | Continue remote sensing activities | Ongoing | There were 224,000 vehicles that were identified as being clean screen eligible through the use of on-road remote sensing. |
| | | | More than 184,000 vehicles of these vehicles completed the clean screen process. The proportion of the fleet observed through remote sensing |
| | | | continues to meet SIP requirements |

| | | 1_, ,, ,, ,, ,, , |
|---|--|---|
| Implement and continue smoking vehicle programs. | Ongoing | The smoking vehicle hotline is maintained to identify excessively smoking vehicles. Smoking vehicle owners are notified that their vehicles may not be in compliance with state statutes. |
| | | Tech center assistance available for motorists with problem vehicles. |
| Participate in Regional Air Quality Council programs. | Ongoing | Participated in the RAQC's mobile source/fuels subcommittee, as part of the development of the ozone SIP. |
| Continue to review auditor A.I.R. Program recommendations. Make changes to IM Program as needed. | Ongoing | Staff worked extensively with the Office of the State Auditor and the auditor's contractor providing program background and data, as well as ambient ozone data. The full audit report will be released December 5, 2017. Was integral party to the 2017 AIR Program Performance Audit. |
| Conduct public outreach, with emphasis on the newly implemented IM program. | Ongoing | Mobile Sources Program continues to conduct public outreach with its Emissions Technical Centers and website, along with activities such as "Tech Nights". The state contractor, Envirotest, in cooperation with CDPHE, maintains outreach programs that include public service radio ads, with further information located on their |
| Contribute area-wide assessment of RVP levels, and other gasoline parameters, as part of Ozone SIP development. | Ongoing. Conduct Summer and Winter gasoline surveys. | and the CDPHE's websites. Staff reported on winter and summer gasoline fuel assessments. 282 samples were collected and analyzed this summer, with 170 samples collected and analyzed this past winter. |

| | | | Measurements on fuel volatility, percent ethanol and sulfur content were conducted. |
|--|---|----------------------|--|
| | Utilize MOVES model in SIP planning and mobile source air quality assessment activities. Continue participation in model improvement and development activities. | Ongoing | Utilized MOVES2014a modeling in support of the Division's emissions inventory development. Assisted RAQC with the ozone SIP development by providing mobile source modeling inputs. |
| | Monitor Federal Renewable Fuels Program. | Ongoing | Staff follows the latest developments, including the new renewable fuels program requirements for the forthcoming year. |
| | Monitor federal new Tier 3 vehicle emissions certification, GHG, and CAFÉ rules. Continue to contrast federal rules to California's LEV program, including the use of zero emitting vehicles. | Ongoing | Staff continues to track EPA and CARB rules that have generally harmonized future emissions, fuel economy and GHG emission standards. |
| | Examine the use of remote sensing to identify vehicles with high evaporative emissions. | Conducting research. | Mobile Sources Program is in the preliminary stages of developing a research project focusing on the ability of utilizing remote sensing to assist, as one component, in the detection and repair of high evaporative emission vehicles. This project is a joint effort with the Regional Air Quality Council. |
| | Continue OBD effectiveness study. | Conducting research. | Continue to assess effectiveness of OBD on an ongoing basis. |
| | Conduct vehicle OBD deterioration study. Study examines vehicle emissions deterioration in OBD equipped vehicles. | Conducting research. | The OBD deterioration study continues to be a study of importance for the mass emissions testing facility. |
| 1.4 Support mobile source strategies through technical studies and | Provide mobile source emission inventories and emission factors. | Ongoing | The EPA's MOVES2014a emissions model continues to be utilized for the development of new mobile source inventories and emission factors. |

| operation of testing equipment and facilities | Operate and maintain Technical Centers. | Ongoing | Emissions Technical Centers continue to assist motorists with free vehicle inspections. Advice to motorists and the repair industry is ongoing. |
|---|--|---------------------------------------|---|
| | Operate and maintain mass emissions testing facility. | Ongoing | The Division's mass emissions testing facility continues to support mobile source and SIP activities through motor vehicle mass emissions testing. |
| | | | Several ongoing research projects are being conducted including vehicle deterioration, and the use of remote sensing to detect excess vehicle evaporative emissions. |
| | | | The test facility is undergoing an extensive upgrade. With this upgrade, the laboratory is positioned to continue cutting-edge vehicle emissions research that conforms with the latest federal requirements. |
| | Conduct an analysis of Colorado fuel market including: volatility, ethanol content, market status and other parameters | Ongoing | Analysis of Colorado fuel market was completed. There was generally good compliance with regulatory standards. |
| | | | Summer fuel volatility averaged 8.6 psi RVP this summer, with last winter's averaging 13.5 psi RVP. |
| | | | All samples contained ethanol at approximately 10% level for both seasons. |
| | Contribute to division inventory report of actual annual emission data. | Ongoing | Mobile Sources Program continues to provide technical input to the Division's development of annual emission data. |
| STATIONARY SOURCE PRO | GRAMS | | |
| 1.5 | Issue permits to minor sources in Colorado. | Number of minor source permits issued | 3,961 minor source permits issued. (Reporting methodology changed to |

| Conduct activities of the Construction Permits Program for stationary sources | | | include individual permits, general permit coverages and exemption evaluations as minor source permitting actions) |
|--|---|--|---|
| | Issue synthetic minor permits to applicable sources in Colorado. | Number of synthetic minor permits issued | 134 synthetic minor source permits issued. |
| | Issue PSD permits. | Number of PSD permits issued | No PSD permits were issued. |
| | Issue permits to major sources in nonattainment areas. | Number of NAA NSR permits issued | No NAA NSR permits were issued. |
| | Enter RACT/BACT/LAER determinations in EPA's clearinghouse database (RBLC) within 30 days following permit issuance, including the "application acceptance date" and "date of permit issuance." | Data entered on a continuing basis | RBLC entries were made on an ongoing basis. |
| | Prepare AIRS data entry and forward to Inventory Group. | Ongoing | AIRS data prepared and forwarded to Inventory Group on an ongoing basis. |
| | Track PSD increment periodically to meet the requirement of 40 CFR 51.166(a)(4). | Ongoing | PSD increment periodically tracked on an ongoing basis. |
| 1.6 Conduct activities of the Operating Permits Program for stationary | Ensure sources submit Title V applications for renewal. | Monitored throughout the year. | Ensured that subject sources submitted Title V applications. Worked with these subject sources through both the permitting and field inspection programs. |
| sources | Prepare AIRS data entry and forward to Inventory Group. | Ongoing | AIRS data prepared and forwarded to Inventory Group on an ongoing basis. |
| | Continue development of program with EPA guidance (Part 70) and input from affected parties. | Ongoing | Program development continues on an ongoing basis consistent with EPA guidance and informed by input from affected parties. |
| | Continue to issue proposed, initial, renewal, and modified Title V permits. | Ongoing | Issued proposed, initial, renewal, and modified Title V permits on an ongoing basis. |
| | Prepare and submit TOPS data to the Region for entry into EPA's national database. | Ongoing | Prepared and submitted TOPS data to EPA Region 8 for entry into national database. |
| | Address recordkeeping and information request requirements. | Ongoing | Recordkeeping requirements addressed through Title V permits |

| 1.7 Operate stationary source emissions and facility data system | Coordinate with EPA on petitions for Title V permits. Utilize the Exchange Network to transfer the Emissions Inventory System information. | Ongoing Ongoing | and information requests are responded to on an ongoing basis. Coordinated with EPA as needed on any Title V permit petitions or EPA orders. Emissions inventory is transferred on an annual basis using the Exchange Network. |
|---|--|------------------|--|
| | Participate in ongoing training provided on National Emission Inventory. | Ongoing | The Inventory & Support team participates in all webinars and training opportunities provided. |
| Compliance and Enforcement | ent Program: | , | |
| 1.8 Develop regulations and strategies to support compliance with regulations | Continue to evaluate methods to incorporate P2 into regulations and permits. | Ongoing | P2 is considered during control strategy development efforts and permitting regulation development and review. |
| | Provide support and training to engineers and inspectors (policy interpretation, settlement documents, assist in negotiation of settlements, enforcement data base). | Ongoing | Support and training provided as needed. |
| | Revise NSR and PSD regulations as needed. | Ongoing | NSR and PSD regulations are revised pursuant to federal requirements. |
| | Revise Reg. 6 - New Source Performance Standards. | Annual - Ongoing | Federal NSPS were reviewed. Revisions and new rules were adopted into Regulation 6 as necessary. |
| | Revise Reg. No. 8 Parts A & E incorporating MACT and NESHAP rulemaking updates and development of cooperative federal/state work plan. To include: funding options; addressing 112(j) compliance deadlines; development and implementation of area source rules; development of information; incorporation of pollution prevention where appropriate; and analyses regarding air toxics. | Annual - Ongoing | Federal MACT and NESHAP were reviewed. Revisions and new rules were adopted into Regulation 8 as necessary. |

| | Revise Common Provisions, Regulation 1, Regulation 3, Regulation 4, Regulation 7 regulations to maintain an updated SIP or in respond to EPA SIP disapproval actions. | Ongoing | Common Provisions, Regulation 1, 3, 4, and 7 are revised as necessary. |
|---|--|--|--|
| 1.9 Continue oversight of local health department contracts and inspections | Negotiate contracts annually. | Local agency contracts follow the state fiscal year (July 1 through June 30). | Contracts for State FY'17-'18 were in place prior to July 1, 2017. |
| 1.10 Conduct compliance inspections and evaluations for industrial sources (major and minor) and final approval evaluations. Report information to EPA through the ICIS-Air Database. | Inspection review, assistance as needed, enter reports on ICIS-AIR, maintain tracking logs, monitor quarterly reports. | Compliance and enforcement activities ongoing; reports are reviewed and entered into ICIS-AIR as they are received, assistance is provided to local agencies as needed and upon request, monthly and quarterly reports are maintained to track local agency activity per contracts | Compliance and enforcement activities ongoing; reports are reviewed and entered into ICIS-AIR as they are received, assistance is provided to local agencies as needed and upon request, monthly and quarterly reports are maintained to track local agency activity per contracts |
| | Ensure proper certifications (odor & opacity) in place for local agency staff. | Contracts require agency staff attend and obtain opacity and odor certifications. Division does periodic spot checks of certification status. | Contracts require agency staff attend and obtain opacity and odor certifications. Division does periodic spot checks of certification status. |
| | Operating and other final permits reviewed. | Ongoing | Ongoing |
| | Conduct final approval evaluations for facilities. | Ongoing; Sources are required to submit a "self-certification" for compliance with initial approval permits; Division reviews all of the required documents before approving the permit for "final approval" | Sources are required to submit a "self-certification" for compliance with initial approval permits; Division reviews all of the required documents before approving the permit for "final approval" |
| | Perform stack testing, source audits and CEM certifications. | Ongoing Number of stack tests Approximately 600+ tests conducted per year Number of relative accuracy test audits Approximately 75 RATAs conducted per year | 359 stack tests conducted during EPA FY'17 (on a per unit basis; test may have been for one or multiple pollutants). 106 RATAs conducted and reviewed during EPA FY'17 |
| | Evaluate excess emission reports. | EERs are submitted on a quarterly basis and are reviewed in detail following submittal. | EERs are submitted on a quarterly basis and are reviewed in detail following submittal. |

| | Provide ICIS-AIR updates as necessary through: | ICIS-AIR updated approximately once per month, including all of the MDRs on all sources; all CMS sources are flagged in ICIS-AIR and HPVs are correctly identified; Division conducts periodic reviews to ensure data is correct | ICIS-AIR updated approximately once per month, including all of the MDRs on all sources; all CMS sources are flagged in ICIS-AIR and HPVs are correctly identified; Division conducts periodic reviews to ensure data is correct |
|--|---|--|--|
| | 1. Provide timely data to ICIS-AIR as identified in the National Minimum Data Requirements (MDR's) on CMS sources evaluated or investigated, and on any other sources that are major according to CAA definition. | Ongoing | Ongoing |
| | 2. Coordinate with EPA to ensure that CMS sources are flagged in ICIS-Air for inspection, and to ensure that high priority violations are correctly identified in ICIS-AIR. | | Ongoing |
| | 3. Perform periodic reviews of ICIS-AIR data to ensure required data have been entered correctly. | | Ongoing |
| | Participate in Cross Media Innovation and Strategy Team | Ongoing | Ongoing |
| | Submit Compliance Monitoring Strategy to EPA | Submitted to EPA by September 30 of each year for the EPA fiscal year beginning on October 1. | CMS Plan for EPA FY'17 was submitted to EPA Region 8 on September 29, 2017. |
| 1.11 Conduct residential burning emissions control program | Participate in High Pollution Advisory Program in Denver metro area. | Ongoing. Daily air quality "Action Day" forecasts are issued from November 1 to March 31. | Ongoing |
| | Respond to and follow up on complaints. | Complaints are investigated as they are received. | Complaint investigations are conducted on an ongoing basis. |
| | Coordinate with WESTAR and EPA in identifying PM2.5 and HAP emission contributions from minor source wood boilers and identifying possible control measures if necessary. | Division participates in workshops, trainings and discussions regarding wood boilers. | Ongoing |

| | Issue warning letters, compliance advisories, NOVs and compliance orders. Conduct AQCC hearings and Settlement Agreements (both state and local agencies) | Ongoing | Ongoing |
|---|---|--|---|
| 1.12 Conduct general open burning program | Issue open burning permits and coordinate enforcement against illegal burning and open burning bans. | Ongoing | Ongoing |
| 1.13 Conduct testing and evaluation of industrial sources | Maintain emissions and facility data system from new, revised and renewed APENs into data system. | Ongoing | Emissions and facility data is updated on an ongoing basis as soon as APENs are received by the Inventory & Support team. |
| 1.14 Monitor local SIP commitments for Reg. No. 16 street sanding | Monitoring and assessing community SIP sanding reduction activities and reports. | Ongoing | Ongoing |
| INDOOR ENVIRONMENT PRO | OGRAM | | |
| 1.15 Reduce asbestos exposure | Conduct 200 inspections for compliance with Regulation No. 8 and NESHAP. | Ongoing Number of inspections completed | There were 544 inspections conducted |
| to the public through operation of the Asbestos Program | Review notifications; issue abatement and demolition permits. | Ongoing Number of demolition permits issued | There were 2797 demolition permits reviewed and issued |
| | | Number of abatement permits issued | There were 6548 asbestos abatement permits reviewed and issued |
| | Process certification applications; issue certifications. | Ongoing Number of certifications reviewed and processed for Workers, Supervisors, Building Inspectors, Management Planners, Project Designers, Air Monitoring Specialists and General Abatement Contractors. Number of registrations reviewed and processed for asbestos laboratories, training providers and asbestos consulting firms. | There were 2895 individual certifications reviewed and processed. There were 274 registrations reviewed and processed |

| | | <u> </u> | 1 |
|---|--|--|--|
| | Initiate enforcement actions; timely and appropriate resolution of cases. | Ongoing Number of non-school cases opened Number of non-school cases closed Number of school cases opened | There were 16 non-school cases opened and 6 non-school cases closed There were 42 school cases opened and 22 closed |
| | Conduct outreach activities. | Number of school cases closed Ongoing Number of outreach activities conducted | There were 4 formal outreach activities conducted |
| | Incorporate asbestos enforcement requirements in local health department contracts. | The Asbestos Unit currently has contracts with three local health departments to perform asbestos inspections. | We continue to have asbestos contracts with three local agencies: Denver, Jefferson and Pueblo |
| | Conduct Rulemaking, as necessary. | The Asbestos Unit will revise Colorado Reg. No. 8 when necessary. | No revisions to Regulation No. 8, Part B were needed or undertaken |
| | Enter data into a database for all asbestos NESHAP notifications and enforcement actions. | Data for all abatement, demolition, certification and enforcement actions is entered into the database on an ongoing basis. | Data for all abatement, demolition, certification and enforcement actions continues to be entered into the database on an ongoing basis |
| | Implement the TSCA Asbestos-in-Schools Program according to federal and state rules. | The Asbestos Unit continues to implement the TSCA Program, assisting schools to manage asbestos in their buildings. Activities include inspections, being available as a resource for school personnel and responding to complaints. All grant related reports were filed with EPA in a timely manner. | The Indoor Environment Program continues to implement the TSCA Program, assisting schools with management of asbestos in their buildings. Activities include inspections, serving as a resource for school personnel and responding to complaints. All grant related activities and reports were completed as required |
| 1.16 | Conduct 48 TSCA/AHERA inspections. | Ongoing | 48 TSCA inspections were conducted |
| Reduce occurrences of asbestos in schools | Conduct approval and maintenance audits of instructors and classes. | Number of inspections conducted Number of course audits conducted | 12 asbestos course audits were completed |
| 1.17 Operation of lead-based paint certification and abatement program. | Conduct 20 inspections for compliance with Regulation No. 19. Conduct 5 406(b) rule inspections. | Ongoing: Number of inspections conducted | There were 7 inspections completed 2 406(b) rule inspections were completed |
| | Implement the 406(b) rule (Part B of Regulation No. 19). | Ongoing. | The Indoor Environment Program continues to provide information to |

| | | | renovation contractors on the requirements of Part B of Regulation No. 19 |
|--|---|--|---|
| | Process certification applications, issue certifications. | Ongoing: Number of certifications processed and issued. | There were 140 individual and 84 company certifications reviewed and processed |
| | Conduct lead-based paint course audits. Conduct approval and maintenance audits of instructors and classes. | Ongoing: Number of audits conducted | There were no lead-based paint course audits conducted |
| | Initiate enforcement actions, timely and appropriate resolution of cases. | Ongoing: Number of actions initiated, Number of resolved | There were no lead-based paint enforcement actions opened, none closed |
| | Distribute educational materials. | Ongoing | The Indoor Environment Program continues to work to educate the public about the dangers associated with exposure to lead-based paint. Activities included a contest for children and distributing items such as tote bags, paint stir sticks and pamphlets with appropriate messaging as well as free lead check kits. |
| | Partner with local health departments. Partner with state and local housing agencies. | Ongoing | The Indoor Environment Program continues to partner with other local health departments and healthy housing organizations. It manages the Colorado Lead Coalition which brings together government and private organizations to promote the goal of ending childhood lead poisoning |
| | Conduct Rulemaking as necessary. | As needed | The Indoor Environment Program did not undertake a revision to Regulation No. 19 |
| PLANNING AND POLICY - SIP DEVELOPMENT, REGULATORY DEVELOPMENT, REGIONAL COLLABORATION, EMERGING ISSUES, COMMUNITY RELATIONS AND COMMUNICATIONS | | | |
| 1.18 | Monitor community initiatives in San Luis Valley, Lamar (to support maintenance SIP), Grand Valley - Grand Junction area, | Ongoing, | EPA concurs on necessary exceptional event documentation. |

| Develop and implement community based air quality programs in cooperation with local agencies or local governments | and other regions of Colorado as warranted. | | Participate in relevant community/area meetings. |
|---|--|---|---|
| | Coordinate Western Colorado Regional Air Quality Collaboration, a voluntary community partnership to promote consistency and collaboration regarding air quality issues. | Ongoing | Ongoing - calls/meetings every 6-8 weeks |
| | Provide assistance to Garfield County community-based initiative to address natural gas development concerns. | Ongoing | Ongoing - semiannual/annual meetings |
| | Work to identify other at risk areas through monitoring or other methods. | Ongoing | Ongoing |
| | Respond to citizen concerns and inquiries regarding Colorado's air quality and air pollution control strategies | Ongoing | Ongoing as requested. Provided information to residents regarding odors near Fort Morgan, among other things. Beginning a statewide stakeholder process to evaluate and recommend hydrocarbon emission reduction strategies for oil and gas operations. |
| 1.19 Develop and/or revise maintenance SIPs and redesignation requests for current nonattainment and attainment/maintenance areas in Colorado | Develop a moderate nonattainment area ozone SIP for the 2008 ozone NAAQS. | Air Quality Control Commission rulemaking in 2016. Submittal to EPA in 2017. | Colorado AQCC approved a SIP for the 2008 ozone NAAQS moderate nonattainment area on November 17, 2016. Submitted to EPA Region 8 in May 2017. |
| | Develop/Prepare Regional Haze 5-year Progress Report SIP. | Submit SIP to Air Quality Control Commission for proposed adoption in fall 2015. RH SIP due to EPA on May 25, 2016. | Timely submittal to AQCC and EPA Region 8. Coordinating future modeling efforts with the Western Regional Air Partnership. |
| | Develop/Prepare 111(d) Clean Power Plan | Submit Plan to Air Quality Control Commission for review in 2016 and submit initial plan to EPA, followed by a final plan in 2017. | Awaiting further action by EPA. In October 2017, EPA issued a notice of proposed rulemaking that proposes to repeal the Clean Power Plan. |
| 1.20 Develop and submit recommended NAAQS designations, as needed | Follow federal NAAQS revision process and prepare recommended designations to submit to EPA as needed. | As needed. Submit potential 2015 ozone NAAQS designation recommendations in 2016. | Designation recommendations for the 2015 ozone NAAQS were approved by the AQCC in September 2016 and submitted to EPA in October 2016. An EPA letter dated |

| | | | December 20, 2017 states that EPA intends to approve Colorado's recommendations. |
|---|--|---|--|
| | Develop/Prepare List of SO2 Sources required to Model/Monitor air quality for future SO2 NAAQS designation | Submit source designations to EPA by January 15, 2016. Complete additional impact analysis by 2016 to ascertain compliance with standard. | Source list and modeling/monitoring plans were timely submitted to EPA Region 8. EPA signed a notice on December 21, 2017 approving the Round 3 designations for Colorado. |
| 1.21 Develop and submit Infrastructure SIPs | Develop and submit 2012 PM2.5 NAAQS infrastructure SIP/certification. | Submit to EPA in late 2015. | Submitted in December 2015. |
| 1.22 Develop and submit Interstate Transport SIPs | Prepare 2010 SO2 NAAQS Interstate Transport SIP. | To be developed based on EPA guidance. | SO ₂ interstate transport SIP public hearing before AQCC is scheduled for January 2018. |
| 1.23 Monitor transportation conformity determinations of MPO and CDOT programs and projects - Regulation No. 10 | Monitor conformity determinations for Metropolitan Planning Organizations (MPOs) along Front Range. | Ongoing | Ongoing |
| 1.24 Support NEPA activities including review of air quality impacts disclosed in NEPA documents | Review and comment on documents/letters prepared for NEPA process such as Environmental Impact Statements and Resource Management Plans. | Ongoing | Ongoing |
| 1.25 Conduct Regional Modeling for ozone and other purposes | Continue review of National Air Toxics Assessments data and comment on proposed rules and policy. | Ongoing | Ongoing |
| 1.26 Operate General Air Toxics Program | Work with other Division programs to seek funding for additional monitoring and grant funding (such as DERA grants). | Ongoing | Ongoing |
| | Complete additional diesel school bus retrofits contingent upon receipt of DERA funds. | Ongoing | Ongoing |

| | Improve oil and gas related emission inventories with additional focus on diesel truck traffic. | Ongoing | Ongoing |
|--|---|--|--|
| | Continue implementation of state-only and federal Mercury control/reduction rules. Assist with Mercury TMDL analysis as needed. | Ongoing | Ongoing - quarterly updates available. |
| 1.27 Implement cross-media initiatives | Continue coordination with other CDPHE programs in development and implementation of: Cross Media Programs, and Environmental Coordinating Committee. | Ongoing | Ongoing |
| 1.28 Operate Small Business Assistance Program | Conduct industry workshops, data collection and coordination. | Ongoing | SBAP conducted 1 workshops and 16 separate trainings. |
| 7. co. co. co. co. co. co. co. co. co. co | Support Compliance Advisory Panel | Ongoing | SBAP attends and supports quarterly CAP meetings. |
| | Update small businesses through site visits and technical assistance (MOU with Field Services Unit). | Site visits performed when requested by business, Field Services, or others. | SBAP conducted 30 on-site visits and assisted 1992 businesses. |
| | Provide consultations and site visits in accordance with MOU with Field Services Unit on enforcement referrals. | Site visits performed when requested by business, Field Services, or others. | SBAP received and acted on 31 enforcement referrals, adhering to the MOU. |
| | Outreach and coordination with local health departments. | Ongoing. Local health departments invited to workshops. | Local health departments are assisted upon request, and invited to workshops and trainings as appropriate. |
| | Participate in Cross Media Innovation and Strategy Team - sector projects and coordination. | Ongoing | SBAP coordinates and attends CMIST meetings. |
| | Develop End-of-year report on compliance assistance efforts | Ongoing - Report developed annually | Report completed and submitted to EPA on time. |
| TECHNICAL SERVICES PRO | GRAM MONITORING, EMISSION INVENTORIES, | MODELING, PRESCRIBED FIRE | |
| 1.29 | Per CFR Schedule, submit all ambient criteria pollutant data to the Air Quality | Ongoing | Ongoing. Data being submitted to AQS in XML. |

| Monitor Air Quality | System (AQS). Per the Exchange Network requirements for regulatory and national system reporting, submit data in XML-format. | | |
|---------------------|--|---|--|
| | Implement ambient air monitoring program in accordance with 40 CFR Part 58. | Ongoing | Ongoing |
| | Submit five-year Network Assessment. | Submitted by July 1, 2015 deadline. Next 5-year Assessment due by 7/1/2020. | No action needed. |
| | Submit annual SLAMS data certification. | Ongoing, due by May 1 each year. | 2016 Data Certification letter submitted to EPA on 5/1/2017. |
| | Operate and maintain monitoring sites statewide (gaseous, particulate, meteorology). Perform daily, weekly, monthly, quarterly, and semi-annual inspections, cleaning, and preventive maintenance per SOP schedules. Perform manual bi-weekly precision tests. | Ongoing | Ongoing |
| | Provide updates to department-wide Quality Assurance Management Plan (QMP) and submit to EPA as needed. | Completed in 2011. Full revision to be submitted to EPA by late 2015. | Updates provided to the department QMP in March 2016. |
| | Revise Quality Assurance Project Plan (QAPP) and submit to EPA. | Ongoing/revisions in progress, to be completed by late 2015 and submitted to EPA. | Full QAPP finalized and sent to EPA in July 2015. Updates in progress for 2018 transmittal to EPA. |
| | Operate ambient air monitoring network in accordance with QAPP. | Ongoing | Ongoing |
| | Modify and update CDPHE sites and data in EPA AQS System. | Ongoing | Ongoing |
| | Produce Annual Air Quality Data Report. | Ongoing | Ongoing. 2016 report published October 2017. |
| | QA / QC Review. | Ongoing | Ongoing. |
| | Submit Annual Network Plan to EPA that is oriented toward the new National Air Monitoring Strategy guidance. Review site files. | Ongoing, due by July 1 each year. | Ongoing. Annual Network Plan submitted to EPA on 6/30/2017. |

| Conduct daily forecasting, summer and winter pollution advisories, and prepare High Pollution Advisory Season and Summer Ozone Advisory Statistics. | Ongoing. Forecasting for Denver and Colorado Springs areas is required by CFR, based on population. Additional non-required forecast areas include Fort Collins-Greeley, Grand Junction, and Colorado River Valley. | Ongoing. Forecasting provided on a daily basis to 7 areas in Colorado, including required Denver and Colorado Springs areas. |
|---|---|---|
| Continue Emergency Response Forecasting and Support to CDPHE Emergency Response Planning. | Ongoing | Ongoing, as needed/requested. |
| Continue NCore monitoring station as approved by EPA. | Ongoing at LaCasa site in Denver. | Ongoing |
| Maintain awareness of requirements for monitoring for new NAAQS. Install sites as needed to meet requirements. | Ongoing. Second near-road NO2 site in Denver installed in late 2015. | Ongoing |
| Maintain awareness of new requirements for Exceptional Events. Flag data in AQS related to natural and exceptional events. Develop and submit documentation to EPA. | Ongoing. Calendar year flags and initial event descriptions in AQS by July 1 of the following year. Development and submittal of exceptional event documents is ongoing. | Ongoing. All 2016 event descriptions and flags placed in AQS before June 30, 2017. Summer 2017 events for ozone are under review. Documentation for some September 2017 ozone/wildfire smoke events is underway. |
| | | Note: Revised EPA Exceptional Events rule eliminates timelines for flagging and reporting. |
| Conduct Special Monitoring Projects. | As needed. Ozone precursor/NMOC sites ongoing in Denver/Weld county area. | Ongoing. Ozone precursor monitoring continuing at 2 sites: CAMP and Platteville. |
| | North Front Range Emissions and Dispersion Study commenced in 2013, scheduled to end 6/30/2016. Community-Scale Air Toxics Grant to commence in late 2015: Determining local scale air toxics | North Front Range Emissions and Dispersion Study has completed, with a final report issued in August 2016. |

| | | gradients near the I-25/I-70 interchange in environmental justice communities in Denver, Colorado. | Community-Scale Air Toxics Grant is ongoing. Field monitoring commenced in April 2017. |
|---|--|--|--|
| | Continue National Air Toxics Trends monitoring site in Grand Junction: Maintain and repair VOC/carbonyl, PAH and PM10/metals monitoring equipment. Install and maintain additional equipment as required. Perform calibrations and audits on the equipment. Interpret and report data received from the analytical lab. Submit data to AQS within 90 days after the end of each quarter. Provide quarterly analysis updates. Perform monitoring according to the NATTS Technical Assistance Document. Review and update QAPP as necessary. | Ongoing. QAPP/SOP updates to be completed and submitted to EPA in late 2015. | Ongoing. QAPP/SOP updates submitted to EPA in Sept. 2015. A new QAPP was submitted to EPA in Sept. 2017 to address EPA guidance/requirements EPA issuance of a new NATTS Technical Assistance Document in October 2016. |
| | Assist local agencies in special monitoring studies. | Ongoing. Work on a locally supported source air toxics study targeted at development activities in Garfield County is continuing. | Ongoing. Garfield County monitoring and support is continuing. |
| 1.30 Develop and Maintain Emissions Inventories | Provide updated emission inventory reports using new EIS system for point, nonpoint and mobile sources (type B) using 2015 emission data and based on the EPA-established reporting thresholds for SOX, NOX, VOC, PM2.5 and PM10, CO, Pb and NH3. | Ongoing | Ongoing |
| | Develop of an Integrated Approach / Methodology for Inventory Development. | Ongoing | Ongoing |
| | Support inventory development for state SIPs including Ozone SIP. | Ongoing | Ongoing. New inventories were developed to support the 2008 Ozone Bump-up SIP completed in November 2016. |
| | Continue work on the 3-state pilot program: monitoring, emissions/data warehouse (as identified in the "2010 | Ongoing. | Ongoing. |

| | Three-State Pilot Project: Air Monitoring | Ozone/meteorological site near Elk | The new Paradox site became |
|--|---|---|---|
| | Site Installation and Operation, Emissions Inventory Data Warehouse Development - | Springs is operational. A site near Paradox is to be installed. | operational in spring 2016. |
| | Colorado Workplan and Budget"), and modeling (as funding is available). This project will be re-named the "Intermountain West Data Warehouse". | Development and implementation of the Data Warehouse is continuing. | Continuing participation in the Intermountain West Data Warehouse steering committee and technical committee. |
| 1.31 Conduct Air Quality | Conduct modeling for stationary source permits. | Ongoing | Ongoing |
| Modeling | Conduct regional modeling for ozone and other purposes. | Ongoing | Ongoing. |
| | | | The 2008 Ozone NAAQS moderate nonattainment area SIP revision was adopted by the AQCC in November 2016. |
| | Conduct modeling for state SIPS as needed. | Ongoing. | Ongoing. |
| | | Current efforts include 75 ppb Ozone SIP bump-up to moderate, 1- hour SO2 designations. | The 2008 Ozone Bump-up SIP was completed in November 2016. |
| | | | Modeling support for the 2010 1- hour SO2 NAAQS designations was completed in December 2016. |
| 1.32 Conduct Prescribed Fire Program | Implement prescribed fire program (develop MOU and issue permits for significant users of prescribed fire through implementation of state-only program through Reg. No. 9: Open Burning, Prescribed Fire and Permitting.) | Ongoing | Ongoing. 314 smoke management permits were issued in 2016. |
| | Conduct oversight to ensure that permittees implement best air quality protection practices in prescribed burning events. | Ongoing | Ongoing |
| | Implement local delegation component of program. | Ongoing | Ongoing |
| | Continue evaluating and implementing recommendations from report developed | Ongoing | Ongoing. In September 2017, additional changes were made to |

| by HB-09-1199 mandate evaluate Smoke Manage Recommendations focu simplified permitting, o monitoring and observa smoke, resource identifi analysis. | standard conditions, as appropriate. Work on pilot burns and subsequent data analysis is ongoing. | further relax standard conditions based on continuing program evaluations. |
|---|---|--|
|---|---|--|

APCD Goal 2: Achieve levels of air quality in Colorado that protect the integrity of the natural ecosystem

APCD Sub-goals include:

- Protect environment from acid deposition damage Ensure all Class I areas are protected from acid deposition impacts and other Air Quality Related Values are protected.
- Protect stratospheric ozone Ensure the control of CFC compounds.
- Take action on climate change Ensure greenhouse gas emissions are managed.
- Protect environment from Mercury contamination.

EPA 2014-2018 Strategic Plan

- Goal 1: Addressing Climate Change and Improving Air Quality:
 - Objective 1.1 Address Climate Change
 - o Objective 1.2 Improve Air Quality
 - Objective 1.3 Restore and Protect the Ozone Layer

| Program Strategy | Activity | Milestone/Measures | FY2017 End-of-Year Status |
|--|-----------------------------|--------------------|---|
| 2.1 Ensure acid rain minimized through operation of construction and operating permit programs | Issue permits to utilities. | Ongoing | Construction and operating permits issued to subject utilities consistent with the requirements of the acid rain program. |

| 2.2 Ensure acid deposition emissions are | Conduct stack testing, source audits and CEM certifications for utilities. | Ongoing | Ongoing. See update under 1.10. |
|---|---|--|---|
| minimized through testing and evaluation of industrial sources | Evaluate excess emission reports for utilities | Ongoing | Ongoing. See update under 1.10. |
| 2.3 Ensure acid rain minimized through updates to Regulation No.18 as necessary | Revise regulation. | Ongoing | No revision to Regulation No. 18 was needed or undertaken. |
| 2.4 | Annually assess monitoring/research data. | Ongoing | Completed through 2016 |
| Reduce nitrogen deposition through implementation of Rocky Mountain National Park Initiative | Work with agricultural stakeholders to develop studies, projects, and Best Management Practices to reduce ammonia emissions | Ongoing | Ongoing; outreach is continuing through the Agriculture Subcommittee. |
| | Assess ammonia inventory categories regularly and potential reduction and/or communication strategies. | Ongoing | Ongoing; steering committee reviewed data requirements. |
| | Focus additional attention to RMNP in regard to AQRV impairment. Continue tracking of nitrogen deposition reduction. Continue collaboration with Agriculture Subcommittee and other stakeholder groups. | Ongoing | Ongoing; Agriculture Subcommittee continues to meet quarterly. |
| 2.5 Protect stratospheric ozone levels through minimizing emissions of CFCs from applicable sources | Equipment registration and facility notification. | Number of equipment items registered, Number of facility notifications | 1211 equipment registrations. 1718 facility notifications. |
| | Inspections (both state and local agencies) for compliance with Regulation No. 15. | Number of inspections conducted | 664 inspections conducted. |
| | Training and outreach (including pollution prevention). | Ongoing | Training of local health department inspectors is ongoing. |
| | Continue to negotiate local health department contracts annually for CFC inspections and enforcement. | Ongoing | Local health department CFC contracts are negotiated annually. |
| 2.6 | Develop policies and regulations as needed to implement the federal GHG rules. | Policies and/or regulations developed to allow state | The Clean Power Plan was stayed by the U.S. Supreme Court. EPA solicited comments |

| Ensure man-made climate change impacts minimized | | implementation of the federal GHG rules as necessary or directed by EPA. | on its potential repeal, revision or replacement. |
|--|--|--|---|
| | Issue Title V and PSD permits for GHG as provided in federal rules. | Ongoing | Included GHG provisions in Title V and PSD permits as required. |
| | Monitor and evaluate reduction strategies. | Ongoing | Ongoing |
| | Monitor legislative activity locally and nationally. | Ongoing | Ongoing |
| | Continue to coordinate with efforts to implement Governor's Climate Change Initiative and greening Government Executive Order | Ongoing | Ongoing; Colorado Climate Plan update proposed for public comment October 2, 2017; Executive Order D 2015-013 signed October 2015; Executive Order D 2017-015 signed July 11, 2017. |
| | Continue to coordinate with efforts to implement Governor's Climate Action Plan. | Ongoing | Ongoing |
| 2.7 Reduce mercury pollution through Colorado cross-media programs | CDPHE Strategic Programming process (see discussion in Chapter 2 of PPA). Assist the Water Division with Mercury TMDLs analyses as needed and ongoing assessment of emissions and deposition. | Ongoing | Ongoing; mercury emission reductions are quantified quarterly (from large stationary sources). |

APCD Goal 3: Achieve a level of ambient air quality that protects and preserves standards for visibility and aesthetic concerns for pollutants that cause odors

APCD Sub-goals include:

- Improve Urban Visibility (Denver AIR Program Area and Fort Collins) Ensure a decrease in the number of days the Colorado Visibility Standard is exceeded in the areas of applicability
- Reduce Regional Haze (for National Parks and Class I Wilderness areas) Ensure natural background visibility conditions in all Mandatory Class I Areas by 2064 through the development and implementation of the Colorado Regional Haze SIP
- Control Odors

EPA 2014-2018 Strategic Plan

• Goal 1: Addressing Climate Change and Improving Air Quality

| Program Objective | Activity | Milestone/Measure | FY2017 End-of-Year Status |
|--|---|---|---|
| 3.1 Reduce pollutants causing haze through the operation of mobile source strategies: Reg. No. 11 - A.I.R. Program Reg. No 12 - Diesel Inspection Smoking vehicles Clean fuels | Described earlier in work plan. | Described earlier Contributed to CDOT/Colorado Energy Office's "Energy Smart Transportation Committee" efforts to promote clean fuels and vehicles, such as CNG and electric vehicles. | Ongoing |
| 3.2 Reduce pollutants causing haze through the operation of the stationary sources program objectives Operation of Construction and Operating Permit Programs Small Business Assistance Program Compliance monitoring and enforcement of stationary sources Wood burning Control Program - High Pollution Advisory Program and state and local woodstove regulations | Described earlier in work plan. | Described earlier | Described earlier |
| 3.3 Support reduction of haze-causing pollutants through regulation updates | Described earlier in work plan. | Described earlier | Ongoing - Division working with WESTAR and WRAP on developing a four-factor regulatory approach for the second 10-year planning period Regional Haze SIP. |
| 3.4 Track program indicators through urban haze monitoring, inventories and modeling | Operate visibility monitoring network in Denver and Fort Collins (transmissometers, nephelometers and web cameras). | Ongoing | Ongoing. The Fort Collins transmissometer was discontinued by the city/owner in January 2017. |
| | Air quality "Action Day" forecasts year-round | Ongoing | Ongoing |

| | Conduct sample speciation and chemical mass balance modeling | Ongoing Supports exceptional event technical documents. | Ongoing as needed |
|---|---|--|---|
| | Perform daily, weekly, monthly, quarterly, and semi-annual inspections, cleaning, and preventive maintenance per SOP schedules. Perform manual bi-weekly precision tests. | Ongoing | Ongoing |
| | Operate and maintain gaseous/continuous sites statewide. | Ongoing | Ongoing |
| | Operate and maintain particulate monitoring sites statewide. | Ongoing | Ongoing |
| | Operate and maintain meteorological monitoring equipment. | Ongoing | Ongoing |
| | Air Quality Forecasting and Air Quality Index (AQI) Reporting on a daily basis. | Ongoing | Ongoing |
| 3.5 Implement the Colorado Regional Haze SIP | Develop SIP strategic plan to coordinate, to the extent allowed, planning efforts for ozone and Regional Haze. | Ongoing | Ongoing - Division working with WESTAR and WRAP on developing emission inventories and modeling in support of the second 10-year planning period Regional Haze SIP. |
| 3.6 Support Class I Attributable Visibility Impairment Visibility SIP | Assemble and analyze IMPROVE monitoring data using statistical methods such as factor analysis, trajectory models, and | Ongoing, as needed. | Ongoing |

| | chemical mass balance models. | | |
|--|--|---------|---------|
| | Provide technical assistance to various visibility workgroups as requested. | Ongoing | Ongoing |
| | Continue to work resolve certification issues. | Ongoing | Ongoing |
| | Three-year review of federal land manager activities as required by SB 17 developed. | Ongoing | Ongoing |
| | Participate in SIP calls. | Ongoing | Ongoing |
| 3.7 Continue implementation of effective fire and smoke management and prescribed fire program | Develop and revise, as needed, Wildfire Response Plan and Protocol. During wildfire events and large prescribed fires, assist land managers in conducting PM monitoring. Coordinate with public information officer and meteorologist. | Ongoing | Ongoing |
| | Participate in the Front Range Roundtable as appropriate. | Ongoing | Ongoing |
| | Work with local communities and partnerships to address wildland fuels treatment as needed. | Ongoing | Ongoing |
| 3.8 | Coordinate with Federal agencies and private entities conducting | Ongoing | Ongoing |

| Track program effectiveness indicators through haze monitoring, inventories and modeling | visibility, lake chemistry and acid deposition monitoring and research in Colorado. Agencies and contractors, to varying degrees, are also involved in AQRV model development. | | |
|--|---|---------|---------|
| | Perform audits of IMPROVE samplers. | Ongoing | Ongoing |

4.0 Water Quality Control Division FY2017 Status and Accomplishments

| TABLE | TABLE 1: FFY16-17 NATIONAL WATER PROGRAM GUIDANCE MEASURES | | | | | | | | |
|--------------|--|---|------------------------------------|-------------------------------|--|--|--|--|--|
| EPA G/O/S | EPA FFY16 ACS Code | EPA FFY16 Measure Text | EPA FFY16 Planning Target | Colorado FFY16-17 Goals | Colorado FFY16-17 Commitment Text | FFY17 Status and Accomplishments | | | |
| | | merica's Waters ct Human Health | | | | | | | |
| | | Water Safe to Drink | | | | | | | |
| 2.1.1 | SDW-211 | Percent of the population served by community water systems that receive drinking water that meets all applicable health-based drinking water standards through approaches including effective treatment and source water protection. | 92% | 92% | Monitor self-reported data submitted by the state's drinking water suppliers, to ensure that reported data meet all existing federal and state requirements; ensure reported data are accurately entered into the state's data system; and that violations are determined and responded to. Measure state outcomes against national targets. | 89.7% | | | |
| 2.1.1 | SDW- SP1.N11 | Percent of community water systems that meet all applicable health-based standards through approaches that include effective treatment and source water protection. | 90% FFY16 (92% FFY18) | 90% | See state commitment narrative for SDW-211. | 82.5% | | | |
| 2.1.1 | SDW-SP2 | Percent of "person months" (i.e. all persons served by community water systems times 12 months) during which community water systems provide drinking water that meets all applicable health-based drinking water standards. | 95% | 95% | See state commitment narrative for SDW-211. | Colorado is not able to generate this measure and continues to rely upon EPA to do so. | | | |

| 2.1.1 | SDW-SP4a | Percent of community water systems where risk to public health is minimized through source water protection. | 49% (national) 35% (regional) | 16% | Report to EPA in the SWAP Performance Accountability Report (PAR) the population numbers served by community water systems where "minimized risk is achieved by substantial implementation" of source water protection actions, as determined by Colorado. | Two hundred and three (203) community water systems and their associated source water areas were reported with "minimized risk achieved by substantial implementation." This equates to approximately 24% of community water systems in Colorado. Colorado has exceeded the sixteen (16%) milestone/performance measure agreed to in the FY2017 Region 8/State PPA target setting table. |
|-------|----------|---|----------------------------------|-----|--|--|
| 2.1.1 | SDW-SP4b | Percent of the population served by community water systems where risk to public health is minimized through source water protection. | 59% (national) 35% (regional) | 15% | Reduce potential consumer exposure of community drinking water systems to various contaminants in raw water sources. Report to EPA in the SWAP Performance Accountability Report (PAR) report the number of source water areas with "minimized risk achieved by substantial implementation" of source water protection actions as determined by Colorado. | Approximately 49% of the population served by community water systems has "minimized risk by substantial implementation." Colorado has exceeded the 15% milestone/performance measure agreed to in the FY2017 Region 8/State PPA target setting table. |
| 2.1.1 | SDW-01a | Percent of community water systems (CWSs) that have undergone a sanitary survey within the past three years (five years for outstanding performers or those ground water systems approved by the primacy agency to provide 4-log treatment of viruses). | 79% | 81% | Eliminate sanitary defects at public water systems that could increase the risk that contaminated drinking water will be distributed to consumers. Conduct sanitary surveys (eight-part) at public water systems as required by Primary Drinking Water Regulations. The state will enter into SDWIS/STATE, the most recent sanitary survey date completed in the last three (3) years for all Subpart H Community Water Systems which have received a survey consistent with the eight-part requirements of 40 CFR 142.16(b)(3) by January 31. In accordance with 40 CFR 142.15(a)(5), the state shall submit to the Region 8 Drinking Water Unit a list of all Subpart H Systems that have had a Sanitary Survey meeting the eight part requirements of 40 | 3. All sanitary surveys are entered into SDWIS. 4. WQCD will submit the Subpart H letter by February 15. |

| | | | | | CFR 142.16(b)(3) during the prior calendar year by the end of January. Colorado will meet its obligation for such a list by entering the completion date of each required Subpart H System survey into SDWIS/STATE and will submit to the Region 8 Drinking Water Program an evaluation of its program for conducting Subpart H System Sanitary Surveys in accordance with 40 CFR 142.16(b)(3) during the prior calendar year as required by 40 CFR 142.15(a)(5) by February 15. 5. Provide in the end-of-year report the number of CWSs that have undergone a sanitary survey and the number and percentage of systems not surveyed within required timeframes in each of the following categories: a) Community groundwater systems not surveyed in the last 3 years; b) Community surface water systems not surveyed in the last 3 years; c) Non-community water systems not surveyed in the last 5 years. | 5. a) Community groundwater. 428 sanitary surveys performed. 55 (11.4%) not surveyed. b) Community surface water systems. 357 sanitary surveys performed. 43 (10.8%) not surveyed. c) Non-community water systems. 1,142 sanitary surveys performed. 0 (0%) not surveyed. |
|---------|--------------|---|-----------|--------------------|---|--|
| 2.1.1 | SDW-15 | Number and percent of small CWS and NTNCWS (<500, 501-3,300, 3,301- 10,000) with repeat health based Nitrate/Nitrite, Stage 1 D/DBP, SWTR and TCR violations. | Indicator | N/A - Indicator | See state commitment narrative for SDW-211. | Colorado is not able to generate this measure and continues to rely upon EPA to do so. |
| 2.1.1 | SDW-17 | Number and percent of schools and childcare centers that meet all health-based drinking water standards. | Indicator | N/A - Indicator | See state commitment narrative for SDW-211. | 55 out of 71 schools in compliance (77.5%). |
| Subobje | ective 2.1.2 | Fish and Shellfish Safe to Ea | nt | | | |
| 2.1.2 | FS-1a | Percent of river miles where fish tissue were assessed to support waterbody-specific or regional consumption | Indicator | N/A | Issue or rescind Fish Consumption Advisories where appropriate. Update on National List of Fish Advisories. | No fish tissue data was collected on rivers and streams in this reporting period. |

| | | advisories or a determination that no consumption advice is necessary. (Great Lakes measured separately; Alaska not included) (Report every two years) | | | Implement statewide fish consumption guidelines. | Fourteen lake and river sites across |
|---------|--------------|--|-----------|----------|--|---|
| 2.1.2 | FS-1b | Percent of lake acres where fish tissue were assessed to support waterbody-specific or regional consumption advisories or a determination that no consumption advice is necessary. (Great Lakes measured separately; Alaska not included) (Report every two years) | Indicator | N/A | Issue or rescind Fish Consumption Advisories where appropriate. Update on National List of Fish Advisories. Implement statewide fish consumption guidelines. | the state were sampled for contaminants in fish tissue from July 1, 2016 through June 30, 2017. No new fish consumption advisories were issued, and modifications were made to existing advisories on five lakes. The advisory on Sweitzer Lake for fish tissue selenium, issued in 2004, was removed based on updated assessment methodology and more recent fish tissue selenium data. 2. No updates for the National List of Fish Advisories were requested from the state during FFY2017. 3. Statewide fish consumption guidelines are now expressed in an easy to understand infographic and are available on our website, as well as in printed material. |
| Subobje | ective 2.1.3 | B Water Safe for Swimming | | <u> </u> | 1 | |

| 2.1.3 | SS-1 | Number and national percent, using a constant denominator, of Combined Sewer Overflow (CSO) permits with a schedule incorporated into an appropriate enforceable mechanism, including a permit or enforcement order, with specific dates and milestones, including a completion date consistent with agency guidance, which requires: 1) implementation of a Long Term Control Plan (LTCP) which will result in compliance with the technology and water quality-based requirements of the Clean Water Act; or 2) implementation of any other acceptable CSO control measures consistent with the 1994 CSO Control Policy; or 3) completion of separation after the baseline date. (cumulative) | 801 (93%) | N/A | Colorado has no CSOs. | Colorado has no CSOs. |
|--------|-----------------|---|---|--------------------|--|--|
| _ | | ct and Restore Watersheds | • | • | | |
| Subobj | ective 2.2.1 | Improve Water Quality on a | Watershed Basi | S | T | |
| 2.2.1 | WQ- SP10.N11 | Number of waterbodies identified in 2002 as not attaining water quality standards where standards are now fully attained. (cumulative) | 4,166 (national) 382 (regional) (4,430 FFY18 national) | 1 FFY16 1 FFY17 | 1. Targeted number of water segments fully restored in FFY15-16 (SP-10); 1. 2. Targeted number of water segments fully restored in FFY16-17 (SP-10); 1. | Colorado is currently working on the 2018 Integrated Report. We will report out on this measure once the data are generated to complete this report. The 2018 IR is due to EPA on April 1, 2018. |
| 2.2.1 | WQ-SP11 | Remove the specific causes of waterbody impairment identified by states in 2002. (cumulative) | 13,228 (national) 920 (regional) | 1 FFY16 1 FFY17 | 1. Targeted number of water quality impairments restored in FFY15 16 (SP-11); 1. 2. Targeted number of water quality impairments restored in FFY16-17 (SP-11); 1. | Colorado is currently working on the 2018 Integrated Report. We will report out on this measure once the data are generated to complete this report. The 2018 IR is due to EPA on April 1, 2018. |

| 2.2.1 | WQ- SP12.N11 | Improve water quality conditions in impaired watersheds nationwide using the watershed approach. (cumulative) | 484 (national) 68 (regional) (575 FFY18 national) | 1 | By January 1, 2016, develop a prioritized list of candidate watersheds for submittal to EPA. The candidate watersheds will be identified based on a number of factors such as: NPS project/activities location information; impairment status; existing data evaluation; identification of data gaps. By May 1, 2016, identify for submittal to EPA at least two near-term, priority watersheds to focus resources for further evaluation and develop workplans, including sampling and analysis plans, to address data and information needs and define milestones necessary to show reasonable progress toward documenting improvement in water quality conditions for each of the near-term, priority watersheds within three years. By 09/30/16, report to EPA progress on implementing workplans for near-term, priority watersheds, especially status of meeting reasonable progress milestones and need to reevaluate other candidates in lieu of a near-term, priority watershed(s) if reasonable progress is not being made. | Incomplete. |
|-------|-----------------|--|--|-----|---|--|
| 2.2.1 | WQ-01d | Number of numeric water quality standards planned to be adopted within 3 years for total nitrogen and total phosphorus for all waters within the state or territory for each of the following waterbody types: lakes/reservoirs, rivers/streams, and estuaries, based on a full set of performance milestone information supplied annually by states and territories (cumulative, out of a universe of 280). | 16 (national) 4 (regional) | N/A | Continue to implement the Nutrient Criteria Development Plan for Colorado, September 26, 2002, Colorado Department of Public Health & Environment, or any revisions to this plan. Provide work products on the tasks identified in milestone schedule and number of applicable standards actions. | Colorado revised its Nutrient Criteria Development Plan as part of the October 2017 rulemaking for Regulations No. 85 and No. 31. The division and Water Quality Control Commission have developed a 10-year roadmap for this effort that will be published as a division policy document. |

| | | | | • | | |
|-------|--------|--|--|-----|---|--|
| 2.2.1 | WQ-03a | Number, and national percent, of states and territories that within the preceding three year period, submitted new or revised water quality criteria acceptable to EPA that reflect new scientific information from EPA or other resources not considered in the previous standards. | 41 (73.3%) (national) 3 (regional) | N/A | Continually review water quality standards and revise them if necessary in accordance with State and Federal statute and Water Quality Control Commission schedule. 1. Scoping Hearing Reg #34/35: 10/2015 and #32/36 10/2016. 2. Formulation Hearing Reg #31 11/2015 and #34/25 11/2016. 3. Rulemaking Hearing All Regs (Temp Mods): 12/2015 and 12/2016. 4. Rulemaking Reg #31 6/2016 and #34/35 6/2017. 5. Prepare notices for Temp Mods rulemaking (by 8/1/2016 and 8/1/2017). | Scoping Hearings: Regs #34/35 10/2015 and #32/36 10/2016. Completed as scheduled. Formulation Hearings: Reg #31 11/2015 and #34/25 11/2016. Completed as scheduled. The 12/2015 and 12/2016 rulemaking hearings for temporary modifications were completed as scheduled. The 12/2017 rulemaking hearing is scheduled and all relevant hearing documents have been submitted to date. Rulemaking Reg #31 6/2016 and #34/35 6/2017. The 6/2016 rulemaking hearing for Regulation #31 was completed as scheduled. The 6/2017 rulemaking hearing for Regulation #34/35 was completed as scheduled. The notices for the Temp Mods rulemaking hearings for December 2016 and December 2017 were submitted. |
| 2.2.1 | WQ-04a | Percentage of submissions of new or revised water quality standards from states and territories that are approved by EPA. | 100% | 3 | Work with EPA and stakeholders to propose revisions to disapproved water quality standards provision in the 2016 Regulation #31 proceedings: a) Nitrate footnote. b) Arsenic footnote. c) Use Protected designation for effluent dependent/ dominated waters. | a) This footnote was repealed with a delayed effective date of 12/31/2022 in the 2016 Reg #31 rulemaking hearing. b) This footnote was deleted in the 2016 Reg #31 rulemaking hearing. c) This section (31.8(2)(b)(i)(C)) was repealed with a delayed effective date of 12/31/2019 in the 2016 Reg #31 rulemaking hearing. |
| 2.2.1 | WQ-09a | Estimated annual reduction in million pounds of nitrogen from nonpoint sources to waterbodies (Section 319 funded projects only). | 9.1 | N/A | Report actual load reductions in GRTS as project-specific information. Request load reduction estimates from new projects. | Actual, project-specific load reductions and load reduction estimates for new projects were reported in GRTS. |
| 2.2.1 | WQ-09b | Estimated annual reduction in million pounds of phosphorus from nonpoint sources to waterbodies (Section 319 funded projects only). | 4.5 | N/A | Report actual load reductions in GRTS as project-specific information. Request load reduction estimates from new projects. | Actual, project-specific load reductions and load reduction estimates for new projects were reported in GRTS. |

| 2.2.1 | WQ-09c | Estimated annual reduction in million tons of sediment from nonpoint sources to waterbodies (Section 319 funded projects only). | 1.2 | N/A | Report actual load reductions in GRTS as project-specific information. Request load reduction estimates from new projects. | Actual, project-specific load reductions and load reduction estimates for new projects were reported in GRTS. |
|-------|--------|--|---|-----|---|---|
| 2.2.1 | WQ-10 | Number of waterbodies identified by states (in 1998/2000 or subsequent years) as being primarily nonpoint source (NPS)-impaired that are partially or fully restored. (cumulative) | 644 (national) 40 (regional) 3 (new success stories) | 1 | By January 1, 2016, develop a prioritized list of candidate watersheds for submittal to EPA. The candidate watersheds will be identified based on a number of factors such as: NPS project/activities location information; impairment status; existing data evaluation; identification of data gaps. By May 1, 2016, identify for submittal to EPA at least two near-term, priority watersheds to focus resources for further evaluation and develop workplans, including sampling and analysis plans, to address data and information needs and define milestones necessary to show reasonable progress toward documenting improvement in water quality conditions for each of the near-term, priority watersheds within three years. By September 30, 2016, report to EPA progress on implementing workplans for near-term, priority watersheds, especially status of meeting reasonable progress milestones and need to re-evaluate other candidates in lieu of a near-term, priority watershed(s) if reasonable progress is not being made. | Incomplete. |
| 2.2.1 | WQ -11 | Number, and national percent, of follow-up actions that are completed by assessed NPDES (National Pollutant Discharge Elimination System) programs. (cumulative) | Indicator | N/A | The division does not currently have any follow-up actions. | The division does not currently have any follow-up actions. |

| 2.2.1 | WQ-12a | Percent of non-tribal facilities covered by NPDES permits that are considered current. [Measure will still set targets and commitments and report results in both % and #.] | 90% | 75% FFY16 1,124 85% FFY17 1,263 | The division's priorities for FY16 and FY17 are to continue issuing individual permits based on the watershed schedule, to complete the sand and gravel stormwater renewals, the hydrostatic testing renewal, the construction SW renewal, and the aquatic animal production renewal. This means the national target will not be met for FY16 because while work will be done on the water treatment plant renewal, it may not be completed until FY17 and while work will be done on the commercial washing renewal it may not be completed until FY18. | The backlog as of 12/1/2017 is 70% current or 30% backlogged. This is less than the goal of 90% current for several reasons, including staffing shortages, litigation and competing work priorities. The division successfully completed the renewal of the sand and gravel general permit and has reissued all pending certifications for this permit. The division has reissued the aquatic animal production renewal and is currently reviewing certifications. The division completed public notice of the construction stormwater general permit and is scheduled to reissue on 1/2/2018. The division is currently reviewing the dewatering and hydrostatic testing permits and plans to reissue in FY18. |
|-------|--------|---|-----------------|--|--|--|
| 2.2.1 | WQ-13a | Number of MS-4s covered under either an individual or general permit. | Indicator | Report | The division maintains permitted MS4 information in ICIS. | All MS-4s in Colorado are covered under an individual permit or general permit. This includes 126 facilities statewide. |
| 2.2.1 | WQ-13b | Number of facilities covered under either an individual or general industrial storm water permit. | Indicator | Report | The division maintains the majority of permitted industrial stormwater information in ICIS. Any permits not maintained in ICIS are reported to EPA through the PMOS database. | A total of 1,745 facilities are covered under the industrial stormwater permit. The majority of these permits are all maintained in ICIS. Any permits not maintained in ICIS are reported to EPA through the PMOS database. |
| 2.2.1 | WQ-13c | Number of sites covered under either an individual or general construction storm water site permit. | Indicator | Report | The division is working to upload construction stormwater permit information to ICIS. If this project is not complete by the end of FY2016 or FY2017 then construction stormwater permit information will be reported through the PMOS database. | A total of 4,595 permittees have coverage under the general industrial stormwater permit. The division maintains construction stormwater permit information in ICIS. The information is also reported through PMOS. |
| 2.2.1 | WQ-13d | Number of facilities covered under either an individual or general CAFO permit. | Indicator | N/A | N/A | To be reported by CDPHE's Division of Environmental Health and Sustainability. |
| 2.2.1 | WQ-14a | Number, and national percent, of Significant Industrial Users (SIUs) that are discharging to POTWs with Pretreatment Programs that have control mechanisms in place that | 20,700 98.0% | | Colorado is not delegated for implementation of the pretreatment program; therefore, EPA is the lead authority on measure WQ14a and the EPA Region 8 reports on this national measure. | Colorado is not delegated for implementation of the pretreatment program. Colorado works with R8 staff to collaborate on pretreatment issues and questions that arise during inspections, enforcement or permit renewals. |

| 2.2.1 | WQ-14b | implement applicable pretreatment standards and requirements. Number, and national percent, of Categorical Industrial Users (CIUs) that are discharging to POTWs without Pretreatment Programs that have control mechanisms in place that implement applicable pretreatment standards and requirements. | Indicator | | Colorado is not delegated for implementation of the pretreatment program; therefore, EPA reports on this national measure. As Colorado has a state pretreatment program, Colorado actively works to permit SIUs in non-pretreatment POTWs and provides that information to EPA. The Division will enter a high priority | Colorado is not delegated for implementation of the pretreatment program. |
|-------|--------|---|-----------|--|---|---|
| 2.2.1 | WQ-19a | Number of high priority state NPDES permits issued in the fiscal year. | 442 | | permit commitment into the PMOS database. The Division will submit the number of priority permits within 30 days of receiving the draft list from EPA. | Seventy-one percent (71%) of assigned high priority permits were issued in FY2017. The division has assigned all high-priority permits in the PMOS system for FY18. |
| 2.2.1 | WQ-27 | Extent of priority areas identified by each state that are addressed by EPA-approved TMDLs or alternative restoration approaches for impaired waters that will achieve water quality standards. These areas may also include protection approaches for unimpaired waters to maintain water quality standards. | 8% | Percent unknown because areas are not yet computed. | Computation of priority areas by EPA is in progress. As a placeholder, FY16 targets are being reported as segment and number of TMDLs: Coal/Slate, COGUUG07_08_10_11_12, TMDLs: 12. Wildhorse Creek, COARMA04a, TMDL: 1. Swede/Kerr Gulch, COSPBE05, TMDL: 1. Big Dry Creek, COSPBD01, TMDL: 1. Big Dry Creek, COARMA18a, TMDLs: 2. FY17 targets as segment and number of TMDLs: Wildhorse Creek, COARMA04a, TMDL: 1. Lower Arkansas 1b, COARLA01b_04_09ab_MA12, TMDLs: 9. Lower Arkansas Reservoirs, COARLA11, COARLA12, COARLA10, TMDLs 4. DeWeese Reservoir, COARUA35, TMDL: 1. Gray Copper, Sneffels Creek, COGUUN07_09, TMDLs: 3. | None of the FY17 TMDL development targets were met. See status update for WQ-28 below for activities leading up to TMDL development. |

| 2.2.1 | WQ-28 | State-wide extent of activities leading to completed TMDLs or alternative restoration approaches for impaired waters, or protection approaches for unimpaired waters. | Indicator | N/A | N/A | WQ-28 activities included: Public notice draft of Wildhorse Creek, COARMA04a TMDL. Collection of TMDL development data in Upper, Middle and Lower Arkansas, Lower Colorado, Uncompandere and South Platte. Outreach and scoping for TMDLs for: COARLA01b_04_09ab_MA12; COARLA11, COARLA12, COARLA10; COARUA35; COGUUN07_09; and COLCLC02b_4a_13bc_19. Outreach and scoping for alternative approach plans for the COSPBE02 E. coli impairment and the COARLA01c_09ab selenium impairment. |
|-------|-------|---|-----------|-----|-----|---|
|-------|-------|---|-----------|-----|-----|---|

| TABLE 2 | 2: FFY16-17 | NATIONAL OFFICE OF ENFO | RCEMENT AND CO | OMPLIANCE AS | SURANCE GUIDANCE MEASURES | |
|--------------|--------------------------|--|------------------------------------|-------------------------------|--|---|
| EPA G/O/S | EPA FFY16 ACS Code | EPA FFY16 Measure Text | EPA FFY16 Planning Target | Colorado FFY16-17 Goals | Colorado FFY16-17 Commitment Text | FFY17 Status and Accomplishments |
| 5 | SDWA02 | The primacy agency must address with a formal enforcement action or return to compliance the priority systems that have a score of 11 or higher on the ETT report. State, territory and tribal breakouts shall be indicated in the comment field of the Annual Commitment System. Please note: A primacy agency's success at addressing violations will be tracked by means of the quarterly ETT reports. Numerical targets may be adjusted at mid-year. While it remains the ERP's goal that all of a priority system's violations will be | | | Annotate the quarterly Enforcement Targeting Tool (ETT) list created by the Enforcement Response Policy (ERP) by indicating the state actions planned for each identified priority ETT system, the projected timeframe for such actions and other relevant information that helps EPA evaluate candidates for federal enforcement. Return the annotated list to EPA within 30 days of the ETT list being posted on ECHO. Address all priority ETT systems (through formal enforcement or appropriate return to compliance) within 6 months of their being identified as priorities, with the goal of taking action before systems reach the priority status. The date that EPA makes the ETT list available on ECHO is day zero (0) of the six-month timeliness period. | Colorado has provided its ETT annotations to EPA in a timely manner. Colorado continues to address all priority ETT systems. Colorado has electronically copied the EPA on all issued enforcement orders. |

| | returned to compliance, a primacy agency has met its commitment under the SDWA ACS measure with respect to a priority system if the score for that system has been brought below, and remains below, eleven. | | 3. Provide EPA with access to state PWS files and data for EPA's oversight purposes at the state's offices. Provide EPA a copy of all final settlement agreements, both administrative and judicial, upon issuance or EPA request. Copies of actions will be provided to EPA Region 8 in electronic format unless EPA requests a hard copy. Upon request make penalty calculations and supporting documentation available to EPA. | |
|-------|--|--------|--|--|
| CWA07 | NPDES Compliance Monitoring Strategy (CMS) plan for each authorized state in the region and a regional plan wherever EPA direct implementation occurs (i.e., non- authorized states, territories, Indian country, pretreatment, etc.), targeting the most significant sources with potential to impact water quality. Each CMS plan should be developed in accordance with the guidelines in Part 1 of the 2014 revised CMS. Any proposed alternative CMS plan should be provided to OECA for consultation and review by August 15, unless the region and OECA agree upon a later date. By December 31, 2015, provide for each state and EPA direct implementation area, a numerical end-of- year report on EPA and state inspection plan outputs from the prior year, by category and subcategory, | Report | Colorado's draft 2016 NPDES Compliance Monitoring Strategy (CMS) plan will be provided to EPA by August 15, 2016, and the plan will be finalized within 15 days of receiving Region 8 EPA's comments or by October 1, 2016. Colorado's draft 2017 NPDES Compliance Monitoring Strategy (CMS) plan will be provided to EPA by August 15, 2017, and the plan will be finalized within 15 days of receiving Region 8 EPA's comments or by October 1, 2017. | A one-week extension was requested and granted, therefore the 2017 NPDES Monitoring Strategy was submitted by August 22, 2017. All comments from EPA were addressed on or before October 1, 2017. |

| responding to each of e planed CMS activities. |
|---|
| e ACS commitment for ch region should reflect to total number of state ch regional CMS plans and ch of year reports to be smitted to OECA for the car (e.g., an annual ACS mmitment of 12 for a pion that will submit six te and regional CMS end-of-year |
| ports). |

| TABLE 3 | 3: FFY16-17 I | REGIONAL ECOSYSTEMS PR | OTECTION PROGR | RAM GUIDANCE | ELEMENTS | |
|--------------|--------------------------|--|------------------------------------|-------------------------------|--|---|
| EPA G/O/S | EPA FFY16 ACS Code | EPA FFY16 Measure Text | EPA FFY16 Planning Target | Colorado FFY16-17 Goals | Colorado FFY16-17 Commitment Text | FFY17 Status and Accomplishments |
| Goal 2: | Protecting A | merica's Waters | | | | |
| | | t Human Health | | | | |
| Subobje | ective 2.1.1 V | Vater Safe to Drink | | | | |
| 2.1.1 | N/A | State, Tribal and Federal water resource management agencies need to effectively manage all groundwater resources in a way that promotes sustainable use of the resource and protects vital ecological resources that relay on ground-water discharge. | N/A | N/A | Groundwater is managed by multiple state agencies per state Senate Bill 181. | The division continues to collaborate with its sister agencies on the protection of groundwater quality throughout the state. |

| TABLE 4 | 4: FFY16-17 | REGIONAL OFFICE OF EN | FORCEMENT, COM | PLIANCE, AND | ENVIRONMENTAL JUSTICE GUIDANCE EL | EMENTS |
|--------------|-----------------------------|---------------------------|------------------------------------|-------------------------------|--------------------------------------|-------------------------------------|
| EPA G/O/S | EPA FFY16 ACS Code | EPA FFY16 Measure Text | EPA FFY16 Planning Target | Colorado FFY16-17 Goals | Colorado FFY16-17 Commitment Text | FFY17 Status and Accomplishments |
| Cross-Pr | rogram Initia | tives | | | | |

| N/A | N/A | States should incorporate environmental justice into their programs and document their commitments in the agreement. | N/A | N/A | The division will include consideration and evaluation for meeting environmental justice in its 2016 and 2017 Clean Water CMSs. | On July 1, 2017, CDPHE published its guidance for incorporating environmental justice into its compliance and enforcement activities in accordance with CDPHE's Health Equity and Environmental Justice Policy. The division will incorporate these principles into inspection planning and enforcement to the extent possible. |
|---------|--------------|--|-----|-----|--|---|
| Clean W | later Progra | m | | | | |
| N/A | N/A | The state agency must maintain national databases. | N/A | N/A | For all domestic and industrial entities (including select stormwater sector permits) with NPDES permits, the division intends to enter permit facility data, permit event data and inspection data, including SSO Inspections, and enforcement actions into ICIS. The division commits to reenter permit facility data, permit event data and inspection data, including SSO Inspections, into ICIS for existing permitted facilities as the permits are renewed and for new facilities as the permits are issued. CDPHE opts to maintain ICIS-NPDES and have data for the annual non-major facilities noncompliance report pulled by EPA in lieu of annual reporting. | The division has complied with this requirement. (Note: In October 2017, EPA discontinued the annual noncompliance report. Colorado will continue to maintain ICIS-NPDES.) |
| N/A | N/A | States are asked to provide projections of program activity for regional and state inspections. | N/A | N/A | Provided in the CMS. | See description in the CMS regarding state inspection commitments. |
| N/A | N/A | Clean Water Act Action Plan. | N/A | N/A | The state and EPA will work together to implement the Clean Water Act Action Plan. The state and EPA will conduct planning meetings | EPA did not engage Colorado on this effort, and therefore, this item should be removed from further reporting requirements. |

| | | | including NPDES compliance and enforcement, permitting and water quality standard personnel to identify water quality issues of greatest concern for Colorado and develop collaborative annual work plans to leverage both state and EPA resources to address these issues. A collaborative work plan will be developed prior to September 15, 2015 for FY2016. | |
|-----|-----|---|---|--|
| N/A | N/A | Evaluate violations and determine an appropriate response as identified in Colorado's Enforcement Management System. Where violations cause or threaten water quality impacts, determine an appropriate response consistent with priorities established in the Clean Water Action Plan and associated Division work plan strategies that focus on achieving environmental outcomes. | Continue to implement the Stormwater Enforcement Response Guide following consideration of available enforcement resources and strategic work plan priorities. Continue to implement the CAFO Enforcement Response Guide following consideration of available enforcement resources and strategic work plan priorities. Continue to implement the Enforcement Response Guide for major/minor domestic and industrial wastewater dischargers, including the enforcement response procedures for whole effluent toxicity (WET), following consideration of available enforcement resources and strategic work plan priorities. Submit as part of the state End-of-Year Report: • A list of facilities who entered into a TIE or TRE in FY16; and • A list of any formal enforcement actions taken in FY16 that included WET violations. A list of any formal enforcement actions taken in FY16 that included WET violations. Quarterly during the fiscal year, and upon receipt from the EPA, the division will provide a response to the Quarterly Non-Compliance Report (QNCR), including an explanation of what the division is doing to respond to the facilities in Significant Non Compliance (SNC) on the QNCR. | Colorado continues to implement its Enforcement Management System (May 2016) which includes enforcement response guides for major/minor domestic and industrial wastewater dischargers, stormwater, and animal feeding operations. In FY17 Colorado continued its compliance oversight for WET violations. The following facilities entered into a TIE or TRE in FY17: • C00020508 - City of Evans - PTIE. • C00041467 - Climax - TIE/TRE. • C00040787 - Pueblo West - PTIE (toxicity disappeared). • C00046761 - Black Hawk/Central City - TIE/TRE. • C00048577 - Iron Mountain Hot Springs - TIE. • C00000213 - Elk Ridge Mining - TIE (toxicity disappeared). • C00038954 - Union Gold - PTIE (toxicity disappeared). • C00049002 - McDonald Farms - TRE. • C00048054 - XTO Energy - Conducted 5 TIEs on separate outfalls. The following formal enforcement actions taken in FY17 included WET violations: |

| | | | | | | CO0048119 - LKA International - NOV/CDO IO-170317-1 included WET effluent violations. CO0048901 - Eagle Valley Clean Energy - COC IC-170512-1 included missing WET DMRs. Colorado complied with its reporting requirements regarding the QNCR. |
|-----|-----|--|-----|-----|---|---|
| N/A | N/A | inspections in regional and national enforcement initiatives according to national and regional guidance and the national 2014-2018 Performance Based strategies and the collaborative annual work plans. The enforcement initiatives include: Municipal Wet Weather Infrastructure; Concentrated Animal Feeding Operations (CAFOs); and Energy Extraction. EPA will conduct inspection follow up and enforcement for those facilities it inspects. | N/A | N/A | N/A | Not applicable for Colorado. |
| N/A | N/A | States are encouraged to continue piloting the Wet Weather SNC Policy in FY16. States are also encouraged to provide feedback in FY16 to the EPA on the SNC Policy if they have piloted it in prior fiscal years. | N/A | N/A | CDPHE will continue to implement its Single Event Violation (SEV) business process in FY16 in order to generally implement the EPA Wet Weather SNC Policy. This includes entering significant (i.e., SNC) Wet Weather single event violations and enforcement actions into ICIS. CDPHE will provide updates to EPA regarding the SEV process during quarterly meetings. | The division has complied with this requirement. |
| N/A | N/A | Continue to implement the Sanitary Sewer Overflow (SSO) Response Strategy until such time as the SSO regulations are finalized. | N/A | N/A | Provide to EPA by October 15 of each year: 1. An updated SSO inventory; 2. The number of NPDES inspections targeted to evaluate SSO issues; 3. The number and percent of SSO inspections in priority watersheds (i.e. 303(d) listed for E. coli) including the | See item-specific deliverable report provided to EPA on October 6, 2017. |

| N/A | N/A | Continue to conduct the DMR Quality Assurance | | | name of the priority watershed (beginning with the October 2013 report); 4. The number and type of informal and formal enforcement actions taken in response to SSOs; 5. The percent of enforcement actions in priority watersheds for SSOs (beginning with the October 2013 report); and 6. A list of SSOs addressed. Copies of all SSO inspections will be submitted to EPA. Follow up on all significant problems with DMR QA and provide EPA with a summary of follow-up actions in the state End-of- | The DMRQA study ended 10/27/17, so the division has not yet evaluated the final results. We are not aware of any significant issues and will update EPA |
|----------|--------------|--|-----|-----|---|--|
| | | Program. | | | Year Report. Report to EPA: | of the results at our quarterly meeting. |
| N/A | N/A | Promote communication with EPA. | N/A | N/A | Final settlement agreements; and A description of any SEPs included in the state enforcement actions concluded in the federal fiscal year. Upon request, penalty calculations, including adjustments and BEN for state enforcement actions concluded during the fiscal year, will be made available to EPA at the state's offices. Quarterly meetings between EPA and the division will be held to discuss current and projected enforcement cases, inspections commitments, worked conducted in priority areas and sectors, environmental justice issues, and any other items as necessary. | The division has complied with this requirement. |
| Drinking | g Water Prog | ıram | | | | |
| N/A | SDWA | The state agency must maintain national databases. | N/A | N/A | The state commits to entering all sanitary surveys performed within 90 days of completion of field work in the previous inspection year into SDWIS/FED (by December 31 for | Colorado enters all Sanitary Surveys into SDWIS within 90 days of the completion of the site visit. Colorado enters all drinking water violations and their associated actions into SDWIS. |

| | | | | | inspections conducted in the previous FFY). 2. Upload all violations, enforcement actions and applicable return-to-compliance codes into SDWIS the quarter following their occurrence. 3. Ensure that all enforcement actions are linked to violations in SDWIS to avoid orphan exceptions, except for the approved orphan actions identified in guidance. |
|-----|------|---|-----|-----|--|
| N/A | SDWA | Adopt regulations within statutory deadlines or EPA approved extension schedule. | N/A | N/A | Colorado currently has primacy enforcement authority for all existing rules. Colorado will submit primacy applications or apply for extensions before statutory deadlines. Colorado commits to maintaining and implementing regulations that are at least as stringent as the federal Safe Drinking Water Act. Colorado's Increased Readability Rulemaking (IRR) project was undertaken to improve readability of Colorado's drinking water regulations in accordance with the governor's initiative to improve efficiency and reduce unneeded regulations. The changes to the drinking water regulations that resulted from the IRR project became effective in March 2014. Because of the significant reorganization of the rewritten regulation, EPA's review generated a significant number of comments. EPA and Colorado commit to address EPA's comments and issues related to stringency. Colorado continues to work with the EPA to gain primacy for the Revised Total Coliform Rule. Colorado's rulemaking is scheduled for April 2018. Colorado's rulemaking is scheduled for April 2018. Colorado's drinking water at least as stringent state at least as tringent state and tringent state at least as trin |
| N/A | SDWA | Implement all primary Drinking Water Regulations for which Colorado has been delegated primary enforcement authority. | | | Colorado will report on the status of the following EPA-identified requirements of the surface water treatment rule. By November 15, provide to EPA: A list of all systems that are required to filter under the SWTR but are not yet filtering. Report the violations to SDWIS-FED. For systems on compliance schedules, provide the schedule from |

| | the enforcement document. If any system is not under a compliance schedule, provide a rationale and proposed action and time frame for securing compliance. |
|--|---|
|--|---|

| TABLE 5: FFY16-17 COLORADO ELEMENTS | | | | | | | |
|-------------------------------------|--------------------------|---------------------------|--------------------------|-------------------------------|--|--|--|
| EPA G/O/S | EPA FFY16 ACS Code | EPA FFY16 Measure Text | EPA FFY16 Planning | Colorado FFY16-17 Goals | Colorado FFY16-17 Commitment Text | FFY17 Status and Accomplishments | |
| N/A | N/A | N/A | N/A | | Colorado is not delegated to implement the biosolids program and maintains a state level program with authority over the land application of biosolids. The division will work collaboratively with EPA to implement the state program in a manner at least as stringent as federal requirements to avoid establishing conflicting requirements. EPA and the division will also coordinate oversight to recognize authorities and avoid duplication of effort as outlined in the inspection plan. | Colorado has coordinated on this effort as required. | |
| N/A | N/A | N/A | N/A | | Colorado is not delegated to implement the pretreatment program and maintains a state level program with authority over discharges to POTWs and implements requirements in permits to implement water quality standards decisions that at times have a nexus to pretreatment implementation. The division will work collaboratively with EPA to implement the state program in a manner to avoid establishing conflicting requirements. EPA and the division will also coordinate oversight to recognize authorities and avoid duplication of effort both in permitting and in compliance oversight as outlined in the inspection plan. EPA will provide pretreatment language for approved and non-approved programs to CDPHE for incorporation into state-issued NPDES permits. | Colorado has coordinated on this effort as required. | |

| N/A | N/A | N/A | N/A | | As requested by Region 8 staff, CDPHE will continue to provide EPA with an electronic copy of industrial and construction stormwater permit information for permits that are not in ICIS on a quarterly basis. | All permits are now in ICIS. |
|-----|-----|-----|-----|-----|---|--|
| N/A | N/A | N/A | N/A | | EPA and CDPHE will coordinate on the performance by EPA of inspections in regional and national enforcement initiatives to minimize overlap and the potential for conflicting determinations. Colorado will begin the implementation of a new strategy to address discharges of stormwater, groundwater dewatering, and hydrostatic testing (and associated discharges from pipes and tanks) associated with construction activities. Included in the strategy will be developing and implementing in FFY2017 an alternative NPDES Compliance Monitoring Strategy meeting the approval criteria in the EPA NPDES Compliance Monitoring Strategy. Colorado will include increased CEI inspections for the construction sector from what was identified in FFY2015 and develop a compliance assistance strategy for implementation in FFY2017. Although EPA reserves the ability to conduct inspections as necessary, EPA will not include CEIs of the associated construction sector discharges as part of its inspection plan for FFY2016 except as associated with regional and national enforcement initiatives, and federal facilities. | Colorado and EPA meet quarterly to coordinate on inspections involving national enforcement initiatives. Colorado began implementing its new compliance strategy for the construction sector in FFY17 and is continuing the implementation in FFY18 as documented in the division's inspection plan. |
| N/A | N/A | N/A | N/A | N/A | CDPHE will continue to implement its monitoring strategy for surface and groundwater (The 10 Elements) and maintain established schedules. CDPHE will: • Develop and implement the Colorado's Water Quality Monitoring and Assessment Strategy (The 10 Elements 2015-2025). • Continue to complete the annual feedback loop with EPA R8 to | An enhanced annual monitoring plan was developed and implemented. The 10 Elements document and the Section 106 Categorical grant are used to guide these enhancements. Colorado's Water Quality Monitoring and Assessment Strategy (The 10 Elements 2015-2025) was updated and submitted to EPA for review. EDU will continue to work with the EPA coordinator to keep this document current. |

| | | | | | report/discuss progress of The 10 Elements Implementation. Develop the enhanced annual monitoring plan by June 30 each year. Work to improve the data flow between CDPHE and EQuIS. Upload state water quality date into national STORET warehouse annually. | An enhanced annual monitoring plan was developed and implemented through the overall water quality monitoring plan in June 2017. EDU staff have made improvements in the procedures for populating EQuIS in a timely and effective manner. This includes a systematic review and preparation of the data. EDU continues to look for additional ways to make improvements to the data flow process. Data collected through June 2017 has been uploaded to STORET. |
|-------|-----------------|--|-----|-----|--|--|
| 2.2.1 | WQ- SP12.N11 | Improve water quality conditions in impaired watersheds nationwide using the watershed approach. | N/A | N/A | Colorado will provide: River, stream and lake segmentation will be available in a GIS Environment. Information from the 303(d) and M&E lists will be managed in a database that can be linked to GIS information. | Colorado continues to work with EPA to make the reach indexed NHD coverage as complete and accurate as possible as basin regulations are revised. Colorado is currently working on the development and updates of the GIS coverage for the 2018 303(d) List of Impaired Waters. This work will be finalized in January/February 2018. Colorado is developing a new assessment database in a GIS Environment. The 2014/2016 Integrated Report was submitted using phase I of this database. Colorado is working on Phase II of this project through an Exchange Network Grant. |
| N/A | N/A | N/A | N/A | N/A | CDPHE will continue to develop a comprehensive integrated assessment of the conditions of Colorado's waters consistent with 305(b) and 303(d) of the Clean Water Act. CDPHE will: Develop the 2014/2016 303(d) List of Impaired Waters. Develop the 2014/2016 Integrated Report. | The process to develop the 2014/2016 Section 303(d) Listing Methodology was completed in March 2015 with significant input from stakeholders. The result of this process is the 2016 303(d) Listing Methodology. The process to develop the 2018 Section 303(d) Listing Methodology was completed in March 2017 with significant input from stakeholders. The result of this process is the 2018 303(d) Listing Methodology. |

| | | The rulemaking hearing to adopt Colorado's 2016 303(d) List was completed in December 2015. The rulemaking hearing to adopt Colorado's 2018 303(d) List was completed in December 2017. |
|--|--|---|
| | | Colorado's 2014/2016 Integrated Report was submitted to EPA on 4/1/2016. |

5.0 Hazardous Materials and Waste Management Division FY2017 Status and Accomplishments

Hazardous Waste Program

<u>Mission:</u> To ensure that all hazardous wastes are handled and managed in ways that protects the public and environment from the moment of waste generation until final disposal or destruction.

| HW I - General Program Manag | ement and Partner | rship | | | | |
|--|---|--------------|--|-------------------------------------|-----------------|---|
| | EPA 2014 - 2018 St | trategic Pla | an Goal 3: Cleaning Up Our Communities and | d Advancing Sustainable Developmen | nt | |
| | HW 1: Long Tern Implement an eff | | d effective hazardous waste regulatory pr | rogram with adequate fiscal and p | personnel resou | rces. |
| Short Term Goal | Short Term Goals | | Objective | Measures | | Results |
| EPA that improves the program. partnership and achieve efficier implementation of a hazardous that reflects the goals and obje | Develop a partnership between the State and EPA that improves the program. Support this partnership and achieve efficient implementation of a hazardous waste program that reflects the goals and objectives of both the State and EPA including appropriate work | | zation te will pursue timely and complete zation for new mandatory rules and s toward overall authorization goals. | FY16: • RCRA Cluster XXIV (SPA 35) | 5) | RCRA XXIV - SPA 35 consists of 3 Checklists: {Checklist 233 - Revisions to the Definition of Solid Waste}; {Checklist 234 - Vacatur of the Comparable Fuels Rule and the Gasification Rule}; and {Checklist 235 - Disposal of Coal Combustion Residuals from Electric Utilities}. Colorado adopted state analogs to the more stringent federal provisions of Checklist 233 on February 16, 2016 {effective March 30, 2016}. Colorado had not adopted rules similar to the federal comparable fuels and gasification rules. Therefore, the vacaturs of Checklist 234 had no effect on the authorization status in Colorado, and no modification to the state program was necessary. Checklist 235 is an optional rule, and Colorado has not adopted state analogs to this rule at this time. |

| HW I - General Program Management and Partner | rship | | |
|---|---|---|---|
| | | • RCRA Cluster XXV (SPA 36) | RCRA XXV - SPA 36 consists of 2 Checklists: {Checklist 236 - Imports and Exports of Hazardous Waste}; and {Checklist 237 - Hazardous Waste Generator Improvements Rule}. Colorado adopted state analogs to the federal provisions of Checklist 236 on October 17, 2017 {effective November 30, 2017}. A rulemaking hearing for adoption of state analogs to the Checklist 237 HW Generator Improvements Rule is scheduled for May 2018. Colorado also adopted state analogs to Checklist 231 (Hazardous Waste Electronic Manifest) from RCRA Cluster XXIII - SPA 34 on October 17, 2017 {effective November 30, 2017}. |
| | EPA will work toward a timely review of authorization applications submitted and improve the overall pace of authorization and authorization flexibility. | | |
| | Program Improvement The State will continue to evaluate the Hazardous Waste Control Program seeking to make further program improvements as appropriate. | Continued implementation of self- certification programs and GAP site visits. | Done |
| | Data Management The State will maintain timely, accurate, and complete data in RCRAInfo. | The State will have data in RCRA Info by the 15 th day of the month following activity. | Done |
| | Note: The State is currently a direct user of RCRA Info and translates only new evaluation data. Colorado has applied for an Exchange Network grant to translate compliance data. | The State will ensure that data is reported to RCRAInfo accurately and completely reflecting the status of the RCRA universe. | Done |

| ensure t | te will continue to work with EPA to that RCRAInfo reports used to track the sof activity are accurate. | RCRAInfo reporting will include all key measures of operating, closure and post-closure permitting; corrective action; and compliance monitoring and enforcement components of the HW program at a level sufficient to support program evaluation efforts. | Done |
|-----------------------------|--|--|------|
| RCRAInt | I assist the State in assuring that the fo data is current and accurate and EPA HW activities as well as State es. | | |
| | I work with the State to resolve se" issues. | | |
| | I provide training and technical assistance equested. | | |
| The State generate the prog | te and EPA will jointly create and e RCRAInfo reports that are of benefit to gram. | | Done |
| The State required includes | te will continue to involve the public as d by statute and regulation or MOA. This is a system to respond to requests for tion and complaints or concerns from the | CDPHE will: Log all complaints and track response and resolution of all complaints. Log all requests for information and track response and resolution. | Done |
| | te Level te will maintain adequate resources to ent the program. | | Done |
| Financia | al Accountability te will adequately account for grant | | Done |

| Tiw 1 - General 110gram Management and 1 arthership | | | |
|--|--|---|-------------------|
| The Sta mainta | m Guidance / Agreements Ite and EPA will jointly develop and in the MOA/EA, Quality Assurance Plan and perating Guidance. | | Done |
| The Sta program address initiativ Annual | ite and EPA will jointly plan and prioritize in goals, objectives and activities that is state and federal priorities and ves. Activities include PPA development, National targets, inspection strategies, g meetings, etc. | EPA and the State will hold meetings to share information, identify and solve problems, and engage in short term planning efforts. | Done as necessary |
| The State coopera assure the pro | nation of Joint Activities Ite and EPA will maintain a high level of ation between State and EPA staff to successful and effective administration of gram including evaluation of desirable al support. | EPA and the State will hold meetings to share information, identify and solve problems, and engage in short term planning efforts. | Done as necessary |
| The State open continuous in prog | nte and EPA will maintain frequent and ommunication on routine matters, changes ram capability, legislation and resources | Examples of key activities include final decisions re: variances / waivers, enforcement actions, biennial report summarization, final permits, etc. | Done as necessary |
| | emergency situations and other key es as described in the MOA. | EPA and the State will hold meetings to share information, identify and solve problems, and engage in short term planning efforts. | Done as necessary |
| The Sta | g and Technical Assistance ate and EPA will jointly identify training chnical assistance needs. | The State will develop and implement a staff training program that results in well-qualified staff and ensures that mandatory training needs are met. | Done |

| HW I - General Program Management and Partner | rship | | |
|---|--|---|------|
| | | EPA will make training and technical assistance available to the State and will work toward improving the capability to provide high quality training and technical assistance. Technical assistance will be made available through EPA staff, EPA research labs and EPA contractors. | |
| | EPA will conduct oversight of State program activities as appropriate. | | |
| HW 3: Short Term Goal - The State and EPA will work together to determine progress in identifying and achieving environmental indicators. Actions necessary to achieve environmental indicators will be planned and tracked. Determination documentation for those facilities "under control" will be provided by the State to EPA; EPA will, in turn, provide guidance for what constitutes "adequate documentation". | | See "Table HW IV" below. | Done |

HW II

Operating Permit and Closure/Post Closure Permit Goals

EPA 2014 - 2018 Strategic Plan Goal 3: Cleaning Up Our Communities, Objective 3.2: Preserve Land

HW Operation Permit Universe Information:

There is only one (1) commercial land disposal facility operating within the State; as of the end of FY17, this facility has the required permit. There are seven (7) operating commercial and non-commercial treatment / storage facilities operating in the State; as of the end of FY17, all required operating permits have been issued, including a RD&D Permit for the Pueblo Chemical Agent-Destruction Pilot Plant (PCAPP) facility. One unit at 1 facility (storage igloos at PCD) is deemed "interim status," but will be closed before it is permitted. Currently, there are no (0) operating combustion units within the State.

HW II

Operating Permit and Closure/Post Closure Permit Goals

| Short Term Goals | Objective | Measures | Results |
|--|---|---|--|
| HW 4: Short Term Goal: Issue and maintain operating permits, closure plans, and post-closure permits that include conditions necessary to assure that hazardous wastes are managed in ways that will protect public health and environmental quality. Ensure protection of public health and the environment by inspecting facilities to determine their compliance with permit or closure plan conditions. | Operating Permit Activities. The State will demonstrate progress toward achieving operating permits (OP) program goals, objectives and activities identified in jointly developed strategies that reflect State and EPA OP priorities. | The Key Measure of the OP process is: OP200 - final determinations / renewal determinations. Supporting Measures include: OP100 - review activities resulting in a determination or notice of deficiency: OP240 - permit modifications; and Emergency Permits. | |
| | | FY16: No (0) treatment, storage and disposal facilities needs to obtain an operating permit final determination. Two (2) TSD facilities are anticipated to obtain a permit renewal. | No (0) treatment, storage and disposal facilities needs to obtain an operating permit final determination. No (0) TSD facilities received a final permit renewal |
| | | No (0) treatment, storage and disposal facility needs to obtain an operating permit final determination. No (0) TSD facility is anticipated to obtain a permit renewal. | No (0) treatment, storage and disposal facilities needs to obtain an operating permit final determination. Three (3) TSD facilities received a final permit renewal |
| | Permit maintenance; permit modifications, and emergency permits will be processed as required. | Permit modifications and emergency permits will be processed as received and required. | Done |
| | EPA will conduct operating permit activities according to the joint permitting process described in the authorization memorandum of agreement. | | |

| HW II | | |
|--|----------------------|--|
| Operating Permit and Closure/Post Closure Perm | it Goals | |
| | EPA will requeste | provide technical assistance where ed. |

HW Closure Universe Information:

There are or have been thirty-three (33) treatment/storage/disposal facilities with land disposal units on the closure track, and seventy-six (76) land disposal units at these facilities. All of the 76 land disposal units have approved closure plans. Three (3) still need closure certification and agency verifications (DuPont, and Fruita-2). Sixty-one (61) treatment/storage/disposal facilities have treatment or storage units on the closure track. Most of these treatment or storage units have had their closure plans approved. The only units without approved closure plans are units that have been referred to the CERCLA remedial process. All four (4) treatment/storage/disposal facilities with combustion units have completed the closure process. One (1) former operating TSD (Arvada Treatment Center) has stopped operating and been abandoned. Removal of all hazardous waste on-site, including hazardous waste tanks was completed by EPA in FY17; the facility has an approved closure plan and must still complete closure verification.

| HW 4 (cont'd) | Closure Activities - | The Key Measure for closure activities is: | |
|-------------------------|--|---|--|
| Issue operating permits | The State will demonstrate progress toward achieving closure (CL) program goals. | CL360 - Closure plan approval. | |
| | | CL380 - Closure verification | |
| | | CL370 - Closure certification | |
| | | FY16: | |
| | | No (0) treatment / storage units will receive closure plan approval One (1) treatment / storage unit will receive closure verification Two (2) closure certifications will be approved | No (0) treatment / storage units received a closure plan approval No(0) treatment / storage unit received a closure verification No (0) closure certifications were approved |
| | | PY17: No (0) treatment / storage units will receive closure plan approval Two (2) treatment / storage units will receive closure verification One (1) closure certification will be approved | No (0) treatment / storage units received a closure plan approval No(0) treatment / storage unit received a closure verification No (0) closure certifications were approved |

HW II

Operating Permit and Closure/Post Closure Permit Goals

| t t | EPA will participate in closure determinations through joint activities and providing technical assistance where requested | | |
|-----|--|--|--|
|-----|--|--|--|

HW Post Closure Universe Information

There are twenty-seven (27) facilities in the post-closure universe in the state as of the end of FY17. The Division has lead for all of these facilities excluding three (3) superfund sites. All required post-closure permits or other approved controls are in place.

| Short Term Goals | Objective | Measures | Results |
|---------------------------------------|---|---|---|
| HW 4 (cont'd) Issue operating permits | Post-Closure Activities - The State will demonstrate program progress toward achieving post-closure (P-C) program goals, objectives and activities that reflect State and EPA P-C priorities. | The Key Measure is: • PC200 - final post-closure permit determinations/ issuances. Post-Closure plan approvals, or other approved controls for all applicable units at facilities in the GPRA post-closure universe. Supporting measures are: • PC300 - other final post-closure permit determinations / issuances. • PC010 - post closure permit call-ins. | |
| | | FY16: One (1) post-closure permit will be renewed One (1) other final or other post-closure permit determination / issuance is anticipated. No (0) post-closure permit call-ins are expected. | One (1) post-closure permit was renewed One (1) other final or other post-closure permit determination / issuance was achieved No (0) post-closure permit call-ins were conducted |

Operating Permit and Closure/Post Closure Permit Goals

| | | FY17: One (1) post-closure permits will be renewed No (0) other final or other post-closure permit determination / issuance is anticipated. No (0) post-closure permit call-ins are expected. | One (1) post-closure permit was renewed No (0) other final or other post-closure permit determination / issuance were achieved No (0) post-closure permit call-ins were conducted |
|--|---|--|---|
| | EPA will participate through joint activities and by providing technical assistance as requested. | | |
| HW 5: Short term Goal Develop mechanisms to improve state-to-state cooperation on permitting of promising innovative waste remediation technologies and the development of such technologies. | HW 2.1.3 Participate in Interstate Technology and Regulatory Cooperation Workgroup. | | Done |
| EPA will conduct oversight of State operating, closure, and post-closure permitting activities. | | | |

HW III

Compliance Monitoring and Enforcement Goals

EPA 2014 - 2018 Strategic Plan Goal 3: Cleaning Up Our Communities

Goal 5: Enforcing Environmental Laws, Objective 5.1

HW 6: Long Term Goal

Ensure protection of public health and environment through achieving compliance of regulated facilities by implementation of an effective monitoring and enforcement program. Detect and deter violations through inspections and enforcement actions and promote compliance with hazardous waste requirements.

HW III

Compliance Monitoring and Enforcement Goals

Outcome Measures:

Return to compliance after enforcement is an important measure of the effectiveness for the enforcement and inspection program. Informal and formal enforcement actions issued in the reporting year are used as the basis for this measure. The measure is the percentage of compliance requirements that are met during the reporting year that they fall due. This measure is expected to be 80% or more in FY16 and FY17.

| Short Term Goals | Objective | Measures | Results |
|--|---|--|---|
| HW 6.1: Short Term Goal Ensure that annual inspection requirements are achieved and that inspections are of high quality. | All federal and state TSDs will be inspected every year. Inspections of state TSDs will be conducted jointly with EPA, with EPA acting as the lead in the inspections. | During FY16 and FY17, 100% of the compliance inspections required by statute will be conducted. | 100% of all required 2016 and 2017 inspections were conducted. |
| Inspections of treatment, storage and disposal facilities will meet the statutory requirements. | All active land disposal facilities will be inspected every year. All those in post-closure will be inspected every other year (every two years). | CDPHE will submit to EPA, by November 15 of each year, an inspection work plan for the upcoming federal fiscal year, | 2016 and 2017 inspection schedules were submitted to EPA before 11/15/2015 and |
| | | which includes the names of TSD and LQG facilities. | 11/15/2016 respectively. |
| | Ground water monitoring inspections will be conducted at active land disposal facilities that have not had such inspections in the previous two years (every three years) or as agreed to by the State and EPA. | A minimum of twenty percent (20%) of all large quantity generators (LQGs) will be inspected during each fiscal year and 100% of all LQGs will be inspected every 5` years. | 100% of LQGs who persisted in the universe over a 5 year period were inspected. |
| | All treatment and storage facilities will be inspected every other year (every two years). | | |
| | Other Priority Inspection Areas - Permit Evaders - Surface Impoundments - Mineral processors - Waste Analysis Plans at commercial TSDFs | | |

| HW III Compliance Monitoring and Enforcement Goals | | | |
|--|---|---|------|
| | The Region commits to work with the State to identify 2 TSDFs and 2 LQGs which the Region will inspect as lead. The LQGs will be identified from the national and regional priority sectors, illegal recyclers, entities with violations in more than one state, environmentally sensitive environment, unpermitted surface impoundments, improper medical waste disposal, coal combustion waste facilities, areas of environmental justice concerns and particularly recalcitrant violators. | | |
| HW 6.2: Short Term Goal Maintain a high level of expertise to ensure that quality inspections consistent with national guidance are being conducted. | High quality inspections will be conducted in accordance with national guidance to be reviewed jointly by the State and EPA in the annual assessment. | EPA State Review Framework Evaluation | Done |
| EPA Region 8 will continue to implement the CERCLA Off-Site Rule (OSR). EPA will continue to coordinate closely with the state in this implementation. | | | |
| HW 6.3: Short Term Goal Promote compliance of regulated facilities by ensuring that enforcement actions are timely. Actions necessary to assure return to compliance (PTC) and consistent with the Enforcement Personne. | Informal actions will be taken as appropriate within the timeframes established in the HMWMD Enforcement Response Policy. | Compliance Advisories (informal enforcement mechanism) will be used as appropriate and consistent with the State's Enforcement Response Policy. | Done |
| (RTC) and consistent with the Enforcement Response Policy will be documented. | Formal enforcement actions, such as | Formal enforcement actions will include | Done |

the use of compliance schedules,

assessment of penalties, and escalation

the violation and consistent with the

HMWMD Enforcement Response Policy.

of enforcement action as appropriate for

administrative orders, judicial referrals and

established in the MOA and the HMWMD

referrals to EPA will be taken as appropriate and within the time frames

Enforcement Response Policy.

| | | I | | |
|--|--|---|--|--|
| | | | | |
| | | | | |
| | | | | |

Compliance Monitoring and Enforcement Goals

| | Enforcement follow-up and other activities will be conducted in accordance with the HMWMD Enforcement Response Policy. | Follow-up will include compliance schedules, follow-up inspections, and compliance assistance and / or escalation of enforcement responses as appropriate and consistent with the HMWMD Enforcement Response Policy. | Done |
|---|--|--|-------------------|
| | The State and Region 8 will work together to move closure/post closure and corrective action facilities to compliance with financial assurance requirements through the development of enforcement cases which may be taken by either the State or EPA. Region 8 will be the lead for entities with facilities in more than one state. | The State and EPA will share any information that is collected regarding the environment and / or public health benefits achieved through inspection and enforcement activities. | Done |
| | Other national enforcement priority areas: Region 8 will continue to support the multimedia Energy Extraction initiative | | |
| EPA and the State will work jointly to assure that the review of enforcement actions is timely and appropriate in accordance with the Enforcement Response Policy. Actions necessary to assure return to compliance (RTC) and consistent with the Enforcement Response Policy will be documented. | EPA will conduct mid-year and end of year file reviews to document the progress CDPHE has made on timeliness of enforcement actions and the appropriate assessment and collection of penalties, including gravity, economic benefit and multi-day penalties. | The State and EPA will have coordination meetings to discuss the compliance and enforcement program. EPA's State Review Framework Evaluation will be used to judge the quality of HMWMD's Program. | Done as necessary |

HW IV

Corrective Action Goals

EPA 2014 - 2018 Strategic Plan Goal 3: Cleaning Up Our Communities, Objective 3.3: Restore Land

Corrective Action GPRA Universe Information:

There are 44 high-priority facilities on Colorado's GPRA 2020 corrective action baseline. Of those facilities, all have been assessed - the RFA is complete (CA050), and all have been prioritized (CA075), according to RCRAInfo.

| HW IV Corrective Action Goals | 3 |
|----------------------------------|---|
| | |

| Corrective Action Identification and Ranking The State will demonstrate progress toward achieving corrective action program identification ranking goals, objectives and activities that reflect State and EPA priorities. | The Key Measures for corrective action progress are: CA 050 -assessment completed; CA 070 - determination of need for RFI; and CA 075 - corrective action universe ranking. | |
|---|---|---|
| EPA will provide technical assistance in identification and ranking activities as appropriate. | FY16 and FY 17: All assessment and ranking activities have been completed; therefore, no activities are planned | No (0) assessment, determinations or ranking activities were completed |
| | and Ranking The State will demonstrate progress toward achieving corrective action program identification ranking goals, objectives and activities that reflect State and EPA priorities. EPA will provide technical assistance in identification and | and Ranking The State will demonstrate progress toward achieving corrective action program identification ranking goals, objectives and activities that reflect State and EPA priorities. FY16 and FY 17: All assessment and ranking activities have been completed; therefore, no activities are planned EPA will provide technical assistance in identification and |

GPRA Corrective Action Universe Information:

There are forty-four (44) facilities on Colorado's GPRA 2020 Corrective Action Baseline. All 44 have had the CA process started with at least a RCRA Facility Investigation (RFI) imposed (CA100) for at least one area. All forty-four (44) facilities have had RFIs approved (CA200) for at least one area. All forty-four (44) have had a remedy selected (CA400) for at least one area. Thirty-three (33) have had a remedy construction completed (CA550) for the entire facility. Seventeen (17) have achieved Corrective Action Process Terminated (CA999) for the entire facility.

| | , | · | |
|---|--|--|--|
| HW 7: Long Term Goal Clean up releases | Corrective Action Progress | The Key Measures for Corrective Action are the following activities: | |
| | The State and EPA will demonstrate progress toward achieving corrective | CA100 - Initial RCRA Facility Investigation (RFI) imposed; | |
| | action program goals, objectives and activities that reflect State and EPA | CA100 - Subsequent RFI imposed; | |
| | priorities. Emphasis will be placed on | CA150 - RFI work plan approved; | |
| | high-ranked facilities. | CA200 - RFI approved | |
| | | CA300 - Corrective Measure Study (CMS) work plan approved; | |
| | | CA350 - CMS approved; | |
| | | CA400 - Remedy Selection | |
| | | | |

| HW IV Corrective Action Goals | | | | |
|---|-------------------------------------|--|--|--|
| | | CA500 - Corrective Measure (CM) work plan approved; CA550 - Corrective Measures implemented (CMI), conscompleted CA999 - Corrective Action complete at the facility level | | |
| HW 7: Long Term Goal Clean up releases | Corrective Action Progress (Cont'd) | FY16: No (0) initial RFIs imposed. No (0) subsequent RFIs imposed. No (0) RFI work plans approved. Six (6) RFI report approved. Twelve (12) CMS work plans approved. Six (6) CMS reports approved. One (1) remedy selected at the unit level. No (0) remedies selected at the facility level. Three (3) CM work plans approved. Four (4) CMI construction completed at the unit level. No (0) CMI construction completed at the facility level. No (0) corrective action completed at the facility level. | No (0) s Five (5) Fourtee Nine (9) Four (4) Five (5) No (0) r Four (4) Seven (1) unit lew No (0) C facility | MI construction completed at the level. orrective action completed at the |
| | | FY17: No (0) initial RFIs imposed. No (0) subsequent RFIs imposed. One (1) RFI work plans approved. No (0) RFI reports approved. No (0) CMS work plans approved. Ten (10) CMS reports approved. Eleven (11) remedy selected at the unit level. No (0) remedies selected at the facility level. Five (5) CM work plans approved. Two (2) CMI construction completed at the unit level. No (0) CMI construction completed at the facility level. No (0) CMI construction completed at the facility level. No (0) corrective action completed at the facility level. | No (0) s One (1) Four (4) Three (Three (Eight (8) No (0) r Seven (Fifteen unit lev No (0) C facility | MI construction completed at the level. orrective action completed at the |

| HW IV Corrective Action Goals | | | |
|---|--|---|---|
| | EPA will conduct corrective action activities at EPA-lead facilities and will conduct joint activities and provide technical assistance, as appropriate. Specifically EPA has assumed the lead for corrective action at two (2) facilities, both are anticipated to become a state-lead facility. | | |
| universe and the remaining res | r (44) high-ranked CA baseline universe facilitie | es have been evaluated for the stabilization measures (CA225 tabilization measures have been imposed (CA600) at twenty | |
| HW 7: Long Term Goal Clean up releases | Stabilization Activities (Interim Measures) - The State will demonstrate progress towards achieving stabilization program goals, objectives and activities that reflect State and EPA priorities. Emphasis will be on increasing the number of facilities at which current human exposures and releases to ground water have been controlled and on facilities that are ranked as "high". | The Key Measures are the following stabilization activities: CA225 - Stabilization Measures Evaluation CA600 - Stabilization Implemented CA650 - Stabilization Construction completed | |
| | Stabilization Activities (Interim Measures) Cont'd | FY16: No (0) Stabilization Measure Evaluations. One (1) Stabilization Implemented. No (0) Stabilization Construction completed. FY17: No (0) Stabilization Measure Evaluations. No (0) Stabilization Implemented. No (0) Stabilization Construction completed. | No (0) Stabilization Measure Evaluations. One (1) Stabilization Implemented. Five (5) Stabilization Construction completed. No (0) Stabilization Measure Evaluations. No (0) Stabilization Implemented. No (0) Stabilization Construction completed. |
| | EPA will conduct Stabilization activities at EPA-lead facilities and will conduct joint activities and provide technical assistance, as appropriate. | | |

HW IV Corrective Action Goals

HW Indicator 2

The State will continue to evaluate the number and percentage of facilities with human exposures under control (CA725).

Note: The definition of "under control" is in USEPA Region 8 RCRAInfo Definition Table, and in EPA guidance (2/5/99) for RCRA corrective action environmental indicators.

GPRA Corrective Action Universe Information:

There are Forty-four (44) facilities in the 2020 Corrective Action Universe. All 44 of these facilities are under control with regard to human exposure as of the end of FY17.

| HW 7: Long Term Goal Clean up releases | The state will work to get human exposure under control at facilities subject to corrective action. Documentation will be submitted to EPA for all facilities that have achieved this environmental indicator. | The Key Output is the number of GPRA Baseline facilities at which human exposures are under control (CA725). The following Key Outputs are planned: FY16 and 17: No (0) facility is projected to achieve this environmental indicator | No (0) facility achieved this environmental indicator |
|--|---|---|---|
| | The State will update the facility-specific strategies, identifying when each high -ranked corrective action facility presently not under control is anticipated to meet this environmental indicator and to develop plans to achieve all projected Environmental Indicators. | The cumulative total in Colorado at the conclusion of FY16 and FY17 will be 100%. | The cumulative total in Colorado at the conclusion of FY16 and FY17 was 100%. |
| EPA has a national goal of having human exposures controlled at 95% of the GPRA Baseline facilities by FY 2005 (HW-11-24) | EPA will work to get human exposures under control at EPA-lead facilities and will provide technical assistance as appropriate. | | |
| | EPA will update facility-specific strategies, identifying when each high -ranked corrective action facility presently not under control is anticipated to meet this environmental indicator and to develop plans to achieve all projected Environmental Indicators. | | |

HW IV Corrective Action Goals

HW Indicator 3

The State will continue to evaluate the number and percentage of facilities with ground water releases under control (CA750).

Note: The definition of "under control" is in USEPA Region 8 RCRAInfo Definition Table, and in EPA guidance (2/5/99) for RCRA corrective action environmental indicators.

GPRA Corrective Action Universe Information:

There are Forty-four (44) facilities in the 2020 Corrective Action Universe. All 44 of these facilities are under control with regard to ground water releases as of the end of FY17.

| HW 7: Long Term Goal Clean up releases | The state will work to get the migration of contaminated ground water under control at facilities subject to corrective action. Documentation will be submitted to EPA for all facilities that have achieved this environmental indicator. | The Key Measure is the number of GPRA Baseline facilities at which migration of contaminated ground water are under control (CA750). The following Key Outputs are planned: FY16: | |
|---|---|--|--|
| | | No (0) facility is projected to achieve this environmental indicator. | One (1) facility achieved this environmental indicator |
| | | FY17: | |
| | | One (1) facility is projected to achieve this environmental indicator | No (0) facilities achieved this environmental indicator |
| | The State will update the facility-specific strategies, identifying when each high -ranked corrective action facility presently not under control is anticipated to meet this environmental indicator and to develop plans to achieve all projected Environmental Indicators. | The cumulative total in Colorado at the conclusion of FY16 will be 100%. | The cumulative total in Colorado at the conclusion of FY16 and FY17 was 100% |

HW V

Pollution Prevention & Compliance Assistance Goals

EPA 2014 - 2018 Strategic Plan Goal 3: Cleaning Up Our Communities, Objective 3.2: Preserve Land

HW V

Pollution Prevention & Compliance Assistance Goals

HW 9: Long Term Goal

Implement a compliance assistance program that increases the compliance rate within HMWMD's regulated communities.

| Short Term Goals | hort Term Goals Objective Measures | | Results | |
|------------------|---|--|--|--|
| | A schedule of quarterly compliance assistance workshops and training sessions will be established. Trainings provide compliance guidance to attendees. | Presentation of hazardous waste compliance assistance seminars, workshops, and/or training sessions: | Provided 8 trainings in FY16 with 500 Attendees | |
| | | Estimate 15 to 20 sessions with 1000 attendees each federal fiscal year. | Provided 3 full day and several 1/2 day trainings to Health Care Sector with 450 attendees, 4 full day HW Generator trainings with 400 attendees, and 1 full day training on New Generator Rule with 120 attendees in FY17 | |
| | Site visits will be made to provide compliance assistance to selected individual businesses that request assistance or that are identified during routine hazardous waste | Implementation of the Generator Assistance Program (GAP). | Performed 18 GAP site visits in FY16. | |
| | inspections. | | Performed 6 GAP site visits in FY17. | |

HW 10: Long Term Goal

Implement a pollution prevention program that encourages reduction of the amount and toxicity of wastes generated through waste minimization, treatment, and recycling of hazardous wastes, thereby reducing the risks associated with waste management. Methods for tracking and quantifying the accomplishments of these efforts will continue to be developed.

| Pollution prevention training will be incorporated into compliance assistance trainings, as appropriate. | Done in conjunction with compliance assistance. | Done |
|--|---|------|
| Distribute pollution prevention information and guidance documents in response to specific requests. | Done in conjunction with compliance assistance and inspections. | Done |

HW V

Pollution Prevention & Compliance Assistance Goals

HW 11: Long Term Goal

Integrate compliance assistance, waste minimization, pollution prevention, waste diversion, and recycling into all program activities and support waste minimization efforts statewide.

| | Develop and implement compliance assistance elements within the inspection and enforcement processes. | Provide direct compliance assistance in inspections: • Estimate 20 inspections in each federal fiscal year. | Compliance assistance was delivered on 113 of the 263 inspections conducted in 2016. Compliance assistance was delivered on 34 of 146 inspections conducted in 2017. |
|---|--|---|---|
| | Distribute pollution prevention information and guidance documents in response to specific requests. | Done in conjunction with compliance assistance. | Done |
| | Support and maintain the technical assistance phone system. | Estimate 3000 responses during each federal fiscal year. | Responded to 1,521 calls and 364 emails in FY16 |
| | | | Responded to 1,469 calls and 248 emails in FY17 |
| | On the CDPHE homepage, provide updates in the hazardous waste activities and access to current compliance assistance and pollution prevention materials and documents. | Maintain homepage information and track usage by Division customers Estimate over 1,000,000 contacts during each federal fiscal year. | The Hazardous Waste Program page on the Division website had 7,848 hits in 2016 and 7,051 hits in 2017 |
| EPA has a goal of building Sustainable Materials Management (SMM) capacity in all Region 8 states. | EPA will provide SMM assistance to Colorado, as requested priorities arise. | Reduction of Waste disposed. | |

EPA will continue to support the environmental Compliance Assistance Center (ECAC) for all auto service businesses that request compliance assistance information. The center is based in Colorado and is available to all states.

State Indoor Radon Grant

Mission: The State Indoor Radon Grant is used to develop effective, efficient activities that increase the awareness of radon health risks in Colorado. Emphasis is placed on raising awareness of radon issues, increasing testing rates and encouraging mitigation in response to elevated radon levels. Homeowners, local governments, realtors and builders will continue to be target groups for information about radon testing and radon-resistant new construction. Distribution of funding to local health departments, cooperative extension offices and other entities at the local level will ensure coverage throughout Colorado. Annual surveys will be conducted on measurement results, mitigation providers, builders and schools as requested by the EPA Radon Reinvigoration Strategy.

State Indoor Radon

Grant Goals

EPA 2014 - 2018 Strategic Plan Goal 1: Taking Action on Climate Change and Ensuring Air Quality, Objective 1.4: Minimize Exposure to Radiation

RA 1: Long-term goal

Increase radon awareness. Assure that Colorado homes continue to be tested for radon, with intervention to reduce radon risk if a test result calls for action.

| Short-term goal | Objectives | Performance measures | Milestones | Results |
|---|---|---|--|--|
| RA 1.1 Increase awareness, testing and mitigation of homes with elevated radon levels. Work toward adoption of more radon-resistant | Contract through the grant for products and services that improve radon awareness, testing, and mitigation in Colorado. | Number and/or percent of homes that have been mitigated for elevated radon levels. | Number of homes that have been mitigated for radon. | It is estimated that 7,500 homes in Colorado were mitigated for radon in 2017 |
| building codes. | Provide current information to homeowners, real estate agents, buyers, sellers, and builders about radon testing and mitigation. | Percentage of homes tested for radon. | Number of homes that have been tested for radon. | It is estimated that 29,000 homes were tested for radon in Colorado in 2017 |
| RA 1.2 Strengthen radon public health activities in all of Colorado's counties (all counties are zone 1-high potential). | Work with volunteer municipalities and counties to adopt construction standards to reduce radon in residential, school, and public buildings. | Number of homes in each county that have been built using radon-resistant features. | Number of homes and schools built radon resistant and number of local governments adopting radon resistant new construction building codes | It is estimated that 800 homes, schools and other buildings were built with RRNC in 2017. Thirty (30) cities and/or counties in Colorado have adopted RRNC building codes. |

| State Indoor Radon | | |
|--------------------|--|--|
| Grant Goals | | |
| | EPA: EPA will offer assistance in public outreach efforts, help coordinate activities of the state and the Western Regional Radon Training Center, provide support for the contracts with counties and partners that have been established and offer manpower at events. | |
| | EPA: EPA will also forward relevant information from HQ or other entities to the state. Guidance will be provided as needed on the information. | |
| | EPA: EPA will also provide support to the state in the creation of radon-related policy statements or programs such as the radon proficiency program. | |
| | EPA: EPA will review annual reports submitted by the state and offer a response that assures that the work plan agreed to is being followed and goals are being met. | |

6.0 E-Enterprise/Exchange Network FY2017 Status and Accomplishments

| Category | Item | Goal | Timeline | Status-October 2017 |
|--------------------------------|---|------------------------|-------------------|------------------------|
| Process | Process Improvement Activities | 15, depending on need, | September | Ongoing |
| Improvement | Implemented | size and scope of | 2017 | |
| Process | Pilot system in production | process Complete | June 2016 | Complete |
| Modernization | Filot system in production | Complete | Julie 2010 | Complete |
| Wodermzation | | | | |
| Process | Submission types in production | 5 | June 2016 | Complete |
| Modernization | | | | |
| Process | Submission types in production | 15, depending on need, | September | 48 processes in |
| Modernization | Submission types in production | size and scope of | 2017 | production |
| | | process | | production: |
| Data Access-Records | System In Production | Complete | December | Complete |
| Management | | | 2015 | |
| Data Access-Records | Web Based Access to Records | Complete | June 2016 | Complete |
| Management | | | | |
| Data Access-Records | Water Quality Control Division | Complete | December | Complete |
| Management | Records In System | | 2015 | |
| Data Access-Records | Air Quality Control Division Records | Complete | December | Complete |
| Management | in System | 0 | 2015 | Deal's H. Ossar Island |
| Data Access-Records | Environmental Commissions Records | Complete | December 2015 | Partially Complete |
| Management Data Access-Records | in System Hazardous Materials and Waste | Complete | | Complete |
| Management | Management Division Records in | Complete | September 2017 | Complete |
| Management | System | | 2017 | |
| Data Access-Records | Division of Environmental Health and | Complete | September | Not Started |
| Management | Sustainability Records in System | | 2017 | |
| Data Access- | Base system chosen | Complete | September | Complete |
| Dashboards | | | 2016 | |

| E- | Participation in E- | 100% | September | Participated in: |
|--|---|------|-----------|---|
| Enterprise/Exchange Network Governance | Enterprise/Exchange Network Governance activities, as appropriate. (Represents the project work for project titled: Colorado PPG E-Enterprise work) | | 2017 | E-Enterprise Leadership Council E-Enterprise Executive Committee Management Board Quad Chairs Advance Monitoring sub team Facility Shared Services Strategy Development |